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WILDERNESS RECOMMENDATIONS

ARCATA RESOURCE AREA

Eden Valley WSA and Thatcher Ridge WSA

FINAL ENVIRONMENTAL
IMPACT STATEMENT

U. S. DEPARTMENT
OF THE INTERIOR

BUREAU OF LAND
MANAGEMENT
CALIFORNIA

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A722
1987

March 3, 1849

IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

Dear Reader:

Enclosed is the final Environmental Impact Statement (EIS) prepared for the Eden Valley and Thatcher Ridge Wilderness Study Areas in the Arcata Resource Area. The EIS analyzes the impact of adding 23,861 acres to the National Wilderness Preservation System. Several No Wilderness Alternatives are also considered. The statement was prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 and responds to the mandates of Sections 202, 203, and 603 of the Federal Land Policy and Management Act of 1976 to review public land roadless areas of 5,000 acres or more and roadless islands having wilderness characteristics; determine their suitability or nonsuitability for wilderness designation; consider through the planning process additional areas that may be suitable; and report these suitability recommendations to the President no later than October 21, 1991.

For further information contact: District Manager, Bureau of Land Management, Ukiah District Office, P.O. Box 940, Ukiah, California 95482.

Sincerely,

Ed Hastey

Ed Hastey
State Director

Enclosure
  Environmental Impact Statement

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DEPARTMENT OF THE INTERIOR

FINAL ENVIRONMENTAL IMPACT STATEMENT

PRELIMINARY WILDERNESS RECOMMENDATIONS
FOR THE
ARCATA RESOURCE AREA

EDEN VALLEY WSA
(CA-050-214)

AND

THATCHER RIDGE WSA
(CA-050-212)

Prepared by

Bureau of Land Management

Ukiah District Office, California

Ed Hastey
State Director, California

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FINAL ENVIRONMENTAL IMPACT STATEMENT ON THE PRELIMINARY WILDERNESS RECOMMENDATIONS FOR EDEN VALLEY WSA AND THATCHER RIDGE WSA

Draft ( )   Final (X)   Environmental Impact Statement

1. Type of Action: Administrative ( )   Legislative (X)

2. Abstract:

The Bureau of Land Management, Arcata Resource Area, Ukiah District, California, has analyzed the impacts and resource tradeoffs of proposals to not designate the Eden Valley Wilderness Study Area (WSA) or the Thatcher Ridge WSA as wilderness. This environmental impact statement also analyzes the impacts and tradeoffs of wilderness designation alternatives. Wilderness characteristics and special features are examined.

3. For Further Information Contact:

District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, California 95482
(707) 462-3873

SUMMARY

The purpose of this Environmental Impact Statement (EIS) is to determine the suitability of two Wilderness Study Areas (WSAs) in the Ukiah District for inclusion in the National Wilderness Preservation System. These are the Eden Valley WSA (CA-050-214) and the Thatcher Ridge WSA (CA-050-212). This EIS assesses the environmental consequences of managing these WSAs as wilderness or nonwilderness. Both WSAs are about 160 miles north of San Francisco, California, and within Mendocino County.

The Proposed Action for the Eden Valley WSA is No Wilderness/No Action. Under this proposal, none of the 6,674 acres would be designated wilderness but would continue to be managed for multiple use. One alternative was also considered--an All Wilderness Alternative which would designate all 6,674 acres as wilderness. Issues analyzed for this WSA were impacts on wilderness values, impacts on sensitive plant species habitat, and impacts on endangered raptors (bald eagles and peregrine falcons).

The Proposed Action for the Thatcher Ridge WSA is also No Wilderness/No Action. Under this proposal, none of the 17,187 acres comprising the WSA would be designated wilderness but would continue to be managed for multiple use. One other alternative was also considered--an All Wilderness Alternative which would designate all 17,187 acres as wilderness. Issues analyzed for this WSA were impacts on wilderness values, impacts on riparian habitat, impacts on endangered raptors, impacts on anadromous fish spawning and nursery streams, and impacts on timber management.

A Summary of Impacts for the Proposed Action and Alternatives for both WSAs is outlined on pp. 2-12 and 2-13 in Chapter 2.

TABLE OF CONTENTS

Page

CHAPTER 1 - INTRODUCTION

Purpose and Need for the Proposed Actions 1-1
The Wilderness Review Process and Its Integration with Planning . . . 1-1
Scoping 1-3
Scoping Process 1-4
Issues Selected for Analysis 1-4
Eden Valley WSA 1-4
Thatcher Ridge WSA 1-5
Issues Considered But Dropped from Further Analysis 1-6
Eden Valley WSA 1-6
Thatcher Ridge WSA 1-7
Selection of the Proposed Action and Development of Alternatives . . 1-9
Eden Valley WSA 1-9
Thatcher Ridge WSA 1-9
Alternatives Considered But Dropped from Further Analysis 1-10
Eden Valley WSA 1-10
Thatcher Ridge WSA 1-10

CHAPTER 2 - THE PROPOSED ACTION And ALTERNATIVES

Eden Valley WSA 2-1
Proposed Action (No Wilderness/No Action) 2-1
Recreational Use Management Actions 2-1
Vegetation Management Actions 2-1
Fire Management Actions 2-2
Wildlife Management Actions 2-2
Grazing Management Actions 2-2
Land Tenure Adjustment Actions 2-2
Mineral Development Actions 2-2
All Wilderness Alternative 2-5
Recreational Use Management Actions 2-5
Vegetation Management Actions 2-5
Fire Management Actions 2-5
Wildlife Management Actions 2-5
Grazing Management Actions 2-6
Land Tenure Adjustment Actions 2-6
Mineral Development Actions 2-6
Thatcher Ridge WSA 2-6
Proposed Action (No Wilderness/No Action) 2-6
Recreational Use Management Actions 2-6
Vegetation Management Actions 2-9
Timber Harvest Management Actions 2-9
Fire Management Actions 2-9
Wildlife Management Actions 2-9
Grazing Management Actions 2-9
Land Tenure Adjustment Actions 2-10
Mineral Development Actions 2-10

Page

All Wilderness Alternative 2-10
Recreational Use Management Actions 2-10
Vegetation Management Actions 2-11
Timber Harvest Management Actions 2-11
Fire Management Actions 2-11
Wildlife Management Actions 2-11
Grazing Management Actions 2-11
Land Tenure Adjustment Actions 2-11
Mineral Development Actions 2-11
Summary of Significant Impacts 2-11

CHAPTER 3 - AFFECTED ENVIRONMENT

Eden Valley WSA 3-1
Wilderness Values. 3-1
Land Ownership 3-2
Cultural Resources 3-2
Recreation 3-3
Visual Resources 3-3
Timber Resources 3-4
Vegetation 3-4
Soils and Watershed Resources 3-5
Wildlife 3-6
Mineral and Energy Resources 3-9
Livestock Grazing 3-10
Thatcher Ridge WSA 3-12
Wilderness Values 3-12
Land Ownership 3-13
Cultural Resources 3-13
Recreation 3-14
Visual Resources 3-14
Timber Resources 3-14
Vegetation 3-17
Soils and Watershed Resources 3-17
Wildlife 3-18
Mineral and Energy Resources 3-18
Livestock Grazing 3-18

CHAPTER 4 - ENVIRONMENTAL CONSEQUENCES

Eden Valley WSA 4-1
Proposed Action (No Wilderness/No Action). 4-1
Impact on Wilderness Values 4-2
Impact on Sensitive Plant Species Habitat 4-3
Impact on Endangered Raptor Populations 4-4
Adverse Impacts Which Cannot Be Avoided 4-4
Relationship Between Local Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity. 4-4
Irreversible and Irretrievable Commitments of Resources 4-5

Page

All Wilderness Alternative 4-5
  Impact on Wilderness Values 4-5
  Impact on Sensitive Plant Species Habitat 4-6
  Impact on Endangered Raptor Populations 4-7
Thatcher Ridge WSA 4-7
  Proposed Action (No wilderness/No Action) 4-7
    Impact on Wilderness Values 4-8
    Impact on Riparian Habitat 4-10
    Impact on Endangered Raptor Populations 4-10
    Impact on Anadromous Fish Spawning and Nursery Streams 4-11
    Impact on Timber Production 4-11
    Adverse Impacts Which Cannot Be Avoided 4-11
    Relationship Between Local Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity 4-12
    Irreversible and Irretrievable Commitments of Resources 4-12
  All Wilderness Alternative 4-12
    Impact on Wilderness Values 4-12
    Impact on Riparian Habitat 4-14
    Impact on Endangered Raptor Populations 4-14
    Impact on Anadromous Fish Spawning and Nursery Streams 4-14
    Impact on Timber Production 4-15

CHAPTER 5 - CONSULTATION AND COORDINATION

Overview of the Process 5-1
Coordination With Other Agencies 5-2
Results From the Public Hearing 5-2
Consistency With Other Plans 5-3
Distribution of the Draft EIS 5-4
Comment Letters and Responses 5-6

LIST OF PREPARERS. P-1

REFERENCES R-1

INDEX. I-1

APPENDIX A A-1

APPENDIX B B-1

LIST OF TABLES

Number Title Page

Table 1 Comparison of Impacts by Alternative - Eden Valley WSA 2-12

Table 2 Comparison of Impacts by Alternative - Thatcher Ridge WSA. 2-13

Table 3 Index to Comment Letters 5-6

LIST OF MAPS

Number Title Page

Map 1 Location Map 1-2

Map 2 Eden Valley WSA - All Wilderness Alternative 2-3

Map 3 Thatcher Ridge WSA - All Wilderness Alternative. 2-7

Map 4 Existing Resources - Eden Valley WSA 3-7

Map 5 Existing Resources - Thatcher Ridge WSA. 3-15

LIST OF PHOTOS

Number Title Page

Photo 1 Eden Valley WSA-Deep Hole Creek. 3-11

Photo 2 Eden Valley WSA -Big Hole Creek Canyon 3-11

Photo 3 Thatcher Ridge WSA-Eel River and Thatcher Creek. 3-19

Photo 4 Thatcher Ridge WSA-Horse Pasture Ridge 3-19

Chapter 1

Introduction

CHAPTER 1

INTRODUCTION

This Environmental Impact Statement (EIS) presents the environmental impacts associated with two proposals and considers the possible consequences of wilderness and no wilderness for two wilderness study areas (WSAs) in the Arcata Resource Area in the Ukiah District, California. They are the Eden Valley WSA (CA-050-214) and the Thatcher Ridge WSA (CA-050-212). These areas are managed by the Bureau of Land Management and are located about 160 miles north of the San Francisco Bay area (Map 1). Both Eden Valley WSA with 6,674 acres, and Thatcher Ridge WSA with 17,187 acres lie wholly within Mendocino County, California.

PURPOSE AND NEED FOR THE PROPOSED ACTION

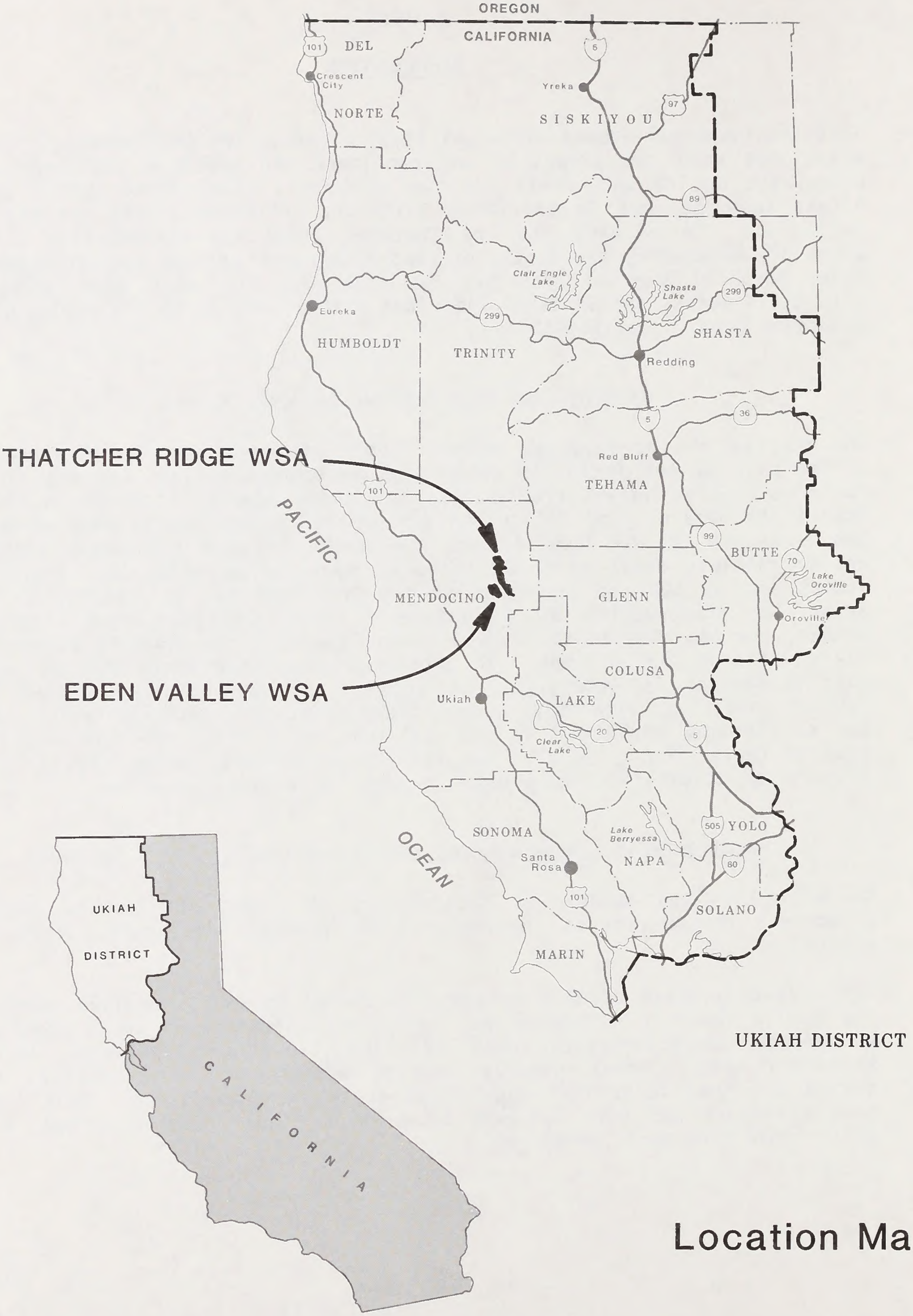
The purpose of the Proposed Actions (both of which are "No Wilderness/No Action") is to set forth the pattern of management actions for each of the two WSAs. This evolves from a requirement included by Congress in Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) directing the Secretary of the Interior and the Bureau of Land Management (BLM) to review roadless areas of 5,000 acres or more having wilderness characteristics and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. In determining these wilderness values, the law directs the Bureau to use the criteria given by Congress in the Wilderness Act of 1964. In Section 2(c) of the Act, Congress states that wilderness is essentially an area of undeveloped Federal land in a natural condition, without permanent improvements or human habitation, which has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

THE WILDERNESS REVIEW PROCESS AND ITS INTEGRATION WITH PLANNING

To accomplish the mandate of Section 603 of FLPMA, the BLM developed a wilderness review process containing three phases: inventory, study, and reporting.

The inventory phase of this process, initiated in 1978, involved examining the public lands to determine and locate the existence of areas containing wilderness characteristics that met the criteria established in the Wilderness Act. Areas clearly lacking wilderness characteristics were sorted out from lands that might have those characteristics. This intensive inventory was then followed by a 90-day public review period, after which final WSAs were identified.

Map 1
Location Map



Location Map

Map 1

This inventory process and a general description of all of California's WSAs are given in Wilderness: Final Intensive Inventory Public Lands Administered by BLM California Outside the California Desert Conservation Area (1979). A copy of this publication is available at any BLM office.

The second step in the review process was to integrate wilderness evaluation into the BLM Planning System (43 CFR 1600), which, in this case, is an Amendment to the East Mendocino Management Framework Plan (MFP). The wilderness study criteria and quality standards containing the BLM's Wilderness Study Policy: Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands (47 FR 5098-5122) were applied to each WSA.

In addition to the above referenced criteria and standards, issues for discussion were identified through public comment and internal scoping; conflicts were analyzed, and alternatives were developed. See page 1-9 for a discussion of which alternatives were selected and why as well as issues and alternatives considered but not found to be significant enough for detailed analysis. These alternatives are the basis for analysis of environmental consequences and resource tradeoffs.

Following public review of the draft environmental impact statement, the Ukiah District, with State Director concurrence, prepared a final environmental impact statement and will prepare a wilderness study report. These will be reviewed by the BLM Director and the Secretary of the Interior, who will file the final EIS and who will make a recommendation to the President. The President has up to two years to make his final recommendation to Congress, which has sole authority to designate an area as wilderness. Until Congress decides whether or not to designate an area as wilderness, the WSAs will be managed in accordance with the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review (Department of the Interior, December 1979, as amended 1983).

SCOPING

The Council on Environmental Quality Regulations Implementing the National Environmental Policy Act (40 CFR Part 1501.7) and the BLM planning regulations (40 CFR 1600.4-1) require an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. Scoping determines the significant issues to be analyzed in the EIS and identifies and eliminates from detailed study insignificant issues or issues addressed in earlier environmental reviews. Scoping thus reduces the length of the EIS and emphasizes the real alternatives and impacts.

During this process, the scope and importance of issues related to the proposed action and alternatives were identified. Information obtained during the scoping process was one of the sources used to determine which impact topics would be addressed in detail in this EIS. Additional purposes of the scoping process are to inform affected Federal, state, and local agencies and other interested parties about the proposed project, and to identify existing environmental reports and information related to the impact assessment.

The scoping process involved discussions with the public and resource specialists and managers of BLM and other relevant agencies. Written comments were received and compiled as a result of Federal Register announcements, news releases, mailings, and articles about the proposal. Comments were also solicited during public meetings. In addition, the initial scoping effort has been followed by an effort to continue agency and public involvement throughout the development of this EIS. This section outlines the steps taken by BLM for the scoping and public involvement process for the EIS.

SCOPING PROCESS

* Initial wilderness inventory and public comment period - 1978-1979.

* Intensive wilderness inventory and public comment period - 1979-1980.

* BLM study and planning process - 1980-1982

A Notice of Intent to prepare an amendment to the East Mendocino Management Framework Plan and the Environmental Impact Statement for the two wilderness study areas was published in the Federal Register on February 14, 1985.

A scoping letter was mailed to over 700 organizations, agencies and individuals on the Ukiah District's wilderness mailing list. This letter explained the planning process and asked for identification of issues for the study areas. Fourteen responses were received.

ISSUES SELECTED FOR ANALYSIS

The environmental issues which were identified for analysis in this EIS as a result of the scoping process are presented below by WSA.

Eden Valley WSA

1. Impact on Wilderness Values. The wilderness values of naturalness, solitude, and primitive recreation could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the Eden Valley WSA not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in the EIS.

2. Impact on Sensitive Plant Species Habitat. Sensitive plant species habitat could benefit from wilderness designation. This habitat could be adversely affected by uses and actions that would occur should the WSA not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in the EIS.

3. Impact on Endangered Raptor Populations. Eden Valley comprises a portion of a feeding territory for bald eagles and a known pair of peregrine falcons nesting north of the area. These species could be affected by ORV use that would be permitted should the area not be designated wilderness. The significance of these impacts is an issue for analysis in the EIS.

Thatcher Ridge WSA

1. Impact on Wilderness Values. The wilderness values of naturalness, solitude, and primitive recreation could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the Thatcher Ridge WSA not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in the EIS.

2. Impact on Riparian Habitat. The WSA contains a variety of intermingled vegetation types and riparian areas which result in excellent habitat for a wide variety of wildlife species. This habitat could be adversely affected by uses that would occur should the area not be designated wilderness. The significance of these impacts is an issue for analysis in the EIS.

3. Impact on Endangered Raptor Populations. Thatcher Ridge comprises a portion of a feeding territory for bald eagles and a known pair of peregrine falcons nesting northwest of the area. These species could also be affected by logging and ORV use that would be permitted should the area not be designated wilderness. The significance of these impacts is an issue for analysis in the EIS.

4. Impact on Anadromous Fish Spawning and Nursery Streams. The Thatcher Ridge WSA comprises a significant portion of the watershed of two important salmon and steelhead spawning and nursery streams. The quality of the streams could be adversely affected by uses that would occur should the area not be designated wilderness. The significance of these impacts is an issue for analysis in the EIS.

5. Impact on Timber Production. Nearly 670 acres of available commercial forest land with over 5 million board feet (MMBF) of standing merchantable timber available for harvest are within the Thatcher Ridge WSA. Wilderness designation could eliminate these lands from timber harvest and preclude reforestation of 200 acres destroyed in a lightning-caused fire in 1969. The impact of wilderness designation on timber management within the WSA is an issue for analysis in the EIS.

ISSUES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

The following issues or concerns were identified in scoping but were not selected for detailed analysis in this EIS. The reasons for setting each of the issues aside are discussed below by WSA.

Eden Valley WSA

1. Impact on Anadromous Fish Spawning and Nursery Streams. The issue of how Deep Hole Creek, an important anadromous fish and native trout spawning and nursery stream, would be affected by not designating the area wilderness was dropped from further analysis. Vehicular use for recreational purposes is the primary influence on increased sedimentation levels in the WSA. Projections indicate that current vehicular use levels of less than 50 visitor days per year will not increase significantly if the area is not designated wilderness. In addition, vehicular access within the Deep Hole Creek drainage is limited and thick vegetation restricts dispersion.

2. Impact on Wildlife Populations and Habitat. An issue dealing with wildlife in general was considered but dropped from further analysis in this EIS because no specific impacts on populations or the habitat of any specific species were identified by the EIS team or the public. Based on the projection of development in the WSA, little or no change in wildlife populations or habitat is anticipated because activity levels with or without wilderness designation affect no major species in any way other than very marginally.

3. Impact on Livestock Operations. Concerns were raised that livestock operators would be required to modify their operations within designated wilderness in a manner that might have adverse impacts on their business. This issue was not considered for further analysis because the BLM's wilderness management policy provides for the continued use of wilderness areas for livestock operations at historic use levels. Although the management practices of livestock operators in the WSAs would be more closely regulated, they would continue as they did prior to wilderness designations. Additionally no facilities or increases in livestock use levels are projected within current planning estimates/projections.

4. Impact on Winter Deer Range. An issue dealing with the effect of wilderness designation on the ability to improve winter deer range was considered but dropped from further analysis. This improvement involves burning overmature chaparral to remove decadent stands and develop stands of new, succulent browse. Wilderness designation does preclude such practices for this purpose. However, prescribed burns will be utilized to maintain the natural condition of the chaparral--a fire-dependent species--thereby improving the winter deer range. The wilderness management policy allows these types of practices to maintain the natural condition of a fire-dependent ecosystem.

5. Impact on Mineral Development. An issue dealing with the development of the area's mineral resources was also considered but dropped from further analysis. Based on known occurrences of minerals from Bureau

of Mines and United States Geological Survey studies on adjacent U.S. Forest Service land, it was determined the area has a low to moderate potential for the occurrence of copper, manganese, chromite, and platinum and a high potential for the occurrence of coal. While there is potential for mineral resource occurrence, there is no indication that large or extractable deposits are present in the WSA. Concerns were raised by the Department of the Interior Bureau of Mines concerning the presence of copper deposits within the WSA. The California Division of Mines and Geology has no record of a small vein of copper ore reported earlier in the century, and there are no known deposits of copper that would prove to be economic to exploit. In addition, the copper mine is on private land. There has historically been no exploration or industry interest in any of these minerals within the WSA, nor have any mining claims been filed in the WSA. The low grade of coal and the small size of the deposit do not make it economically feasible to mine. No development is, therefore, anticipated.

6. Impact on Cultural Resources. The possible impacts on cultural resources expressed by the National Park Service were considered but dropped from further analysis. Management actions are described in Chapter 2 of the EIS to identify the extent of potential impact causing activities such as mineral development and ORV activities. These activities are the result of planning projections and are not described in the detail that would be required in a plan of operations or recreation activity management plan. Since various procedures such as Section 106 compliance and the Bureau's own mandates under the National Historic Preservation Act would provide the opportunity to identify potential impacts of these activities and to develop appropriate mitigation measures, the issue of impacts on cultural resources is not considered in detail in the EIS. In addition, the potential for indiscriminate surface disturbing activities is negligible.

Thatcher Ridge WSA

1. Impact on Wildlife Populations and Habitat (Other than Riparian Habitat). The reasons for dropping impact on wildlife populations and habitat in the Thatcher Ridge WSA are the same as those given for Eden Valley WSA on p. 1-6.

2. Impact on Winter Deer Range. The reasons for dropping impact on winter deer range in the Thatcher Ridge WSA are the same as those given for the Eden Valley WSA on p. 1-6.

3. Impact on Livestock Operations. The reasons for dropping impact on livestock operations in the Thatcher Ridge WSA are the same as those given for the Eden Valley WSA on p. 1-6.

4. Impact on Mineral Development. An issue dealing with the development of the area's mineral resources was considered but dropped from further analysis. The area has a low to moderate potential for the occurrence of copper and manganese and is classified as prospectively valuable for geothermal resources. While there is potential for mineral resource occurrence, there is no indication that large or extractable deposits are present in the WSA. USGS and BM reports indicate no significant

deposits in surrounding U.S. Forest Service lands. California Division of Mines and Geology indicates little industry interest in the general area. Like the Eden Valley WSA, there has been no exploration or industry interest in any of the minerals, nor have any mining claims been filed in the WSA. In addition, the potential for occurrence of any economic geothermal resource is low and geothermal indicia in the area are scarce. No development is, therefore, anticipated.

5. Impact on Water Quality. The possible impacts on water quality, expressed by the Environmental Protection Agency and the National Park Service, were considered and dropped from further analysis. Management actions are described in Chapter 2 of the EIS to identify the extent of potential impact causing activities such as timber management and ORV activities that could occur in the WSA. These activities are the result of planning projections only and are not described in the detail that would be required in a timber harvest plan. It is anticipated that none of these projected activities would occur adjacent to or in close proximity to perennial streams or water sources. Since various water resource agencies including the EPA, the North Coast Region Water Quality Control Board as well as the BLM would require an array of mitigation measures to assure proposed projects meet water quality standards required by State and Federal law, the issue of impacts on water quality is not considered in detail in the EIS. The mitigation measures required in Sustained Yield Unit 13 are included as Appendix A.

6. Impact on Cultural Resources. The possible impacts on cultural resources expressed by the National Park Service were considered but dropped from further analysis. Management actions are described in Chapter 2 of the EIS to identify the extent of potential impact causing activities such as timber management and ORV activities. These activities are the result of planning projections and are not described in the detail that would be required in a timber harvest plan or recreation activity management plan. Since various procedures such as Section 106 compliance and the Bureau's own mandates under the National Historic Preservation Act would provide the opportunity to identify potential impacts of these activities and to develop appropriate mitigation measures, the issue of impacts on cultural resources is not considered in detail in the EIS. In addition, the potential for indiscriminate surface disturbing activities is negligible.

7. Impact on the Middle Fork of the Eel River. The Middle Fork of the Eel River flows for 5 miles through the WSA and has been designated a "Wild and Scenic River" under the Wild and Scenic Rivers Act. An issue dealing with how the Scenic River would be affected by nondesignation as wilderness was considered but dropped from further consideration. The only surface disturbing activity that has the potential for significant impacts on the River is timber harvesting. Mitigation measures in Sustained Yield Unit (SYU) 13 and protection afforded in the Wild and Scenic River Act and resultant regulations adequately safeguard the integrity of the River's status. Any surface disturbing activity is preceded by a site specific plan that must consider impacts and either preclude or mitigate unacceptable impacts (See Appendix B).

SELECTION OF THE PROPOSED ACTION AND DEVELOPMENT OF ALTERNATIVES

Development of the proposed action is guided by requirements of the Bureau's Planning Regulations (43 CFR Part 1600) and the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing specific factors to be considered during the planning sequence in developing suitability recommendations.

Outlined below are the Proposed Actions and alternatives developed for the Eden Valley and Thatcher Ridge WSAs selected for analysis.

Eden Valley WSA

The Proposed Action for the Eden Valley WSA is No Wilderness/No Action. Under this proposal, none of the 6,674 acres would be designated wilderness, but would continue to be managed for multiple use as described in this document and the East Mendocino MFP.

The rationale for this proposal is (1) the WSA does not provide unique special ecologic, geologic, or other special scientific, educational, or scenic values that would receive additional or substantial benefits from wilderness designation; (2) the current use levels have had no detrimental effect on the wilderness values the area possesses; (3) projected ORV use levels, coupled with the area's restricted access, will not increase enough to significantly affect these values; (4) current management has proven effective in maintaining the area's existing resources; and (5) no significant conflicts have been identified.

One alternative was also considered--an All Wilderness Alternative which would designate all 6,674 acres as wilderness. The All Wilderness Alternative represents the maximum possible acreage that could be recommended for wilderness designation.

Thatcher Ridge WSA

The Proposed Action for the Thatcher Ridge WSA is No Wilderness/No Action. Under this proposal, none of the 17,187 acres comprising the WSA would be designated wilderness, but would continue to be managed for multiple use as described in this document and the East Mendocino MFP with the exception of the Middle Fork of the Eel River Wild and Scenic corridor. This corridor will be managed in accordance with the Department of Interior's Wild and Scenic River Guidelines (Federal Register, Vol. 47, No. 173) until a corridor management plan is completed in 1987. These guidelines provide that the river corridor will be managed "in such a manner as to protect and enhance" its scenic values.

The rationale for this proposal is (1) the WSA does not provide unique special ecologic, geologic, or other special scientific, educational, or scenic values that would receive additional or substantial benefits from wilderness designation; (2) the current use levels have had no detrimental effect on the wilderness values the area possesses; (3) projected use levels will not increase enough to significantly affect these values; (4) current management has proven effective in maintaining the area's existing resources; (5) the area's wilderness values along the Middle Fork of the Eel River will be protected under its designation as a Wild and Scenic River; and (6) no significant conflicts have been identified.

One alternative was also considered--an All Wilderness Alternative which would designate all 17,187 acres as wilderness. The All Wilderness Alternative represents the maximum possible acreage that could be recommended for wilderness designation.

ALTERNATIVES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

Eden Valley WSA

An additional alternative considered but dropped from further analysis would have combined the Eden Valley WSA, Thatcher Ridge WSA and contiguous U.S. Forest Service RARE II areas (Elk Creek, 17,400 acres and Thatcher, 12,200 acres) into one study area of approximately 53,000 acres. However, the California Wilderness Act of 1984 (PL 98-425) released the two Forest Service areas from further study, with the provision that they be considered during the revision of the Forest Plan. In addition, Eden Valley WSA and Thatcher Ridge WSA are not contiguous, but are separated by private lands which precludes study as one area. The northern portion of the Eden Valley WSA was dropped from further consideration during the inventory phase because it was separated by a road. The Interior Board of Land Appeals later upheld the Bureau's decision to drop the approximately 4,050 acres from further wilderness consideration.

In the Proposed Land and Resource Management Plan for the Mendocino National Forest, the U.S. Forest Service has identified contiguous forest lands to be managed for wildlife, range, timber, and spotted owl. Recreation and wilderness would receive little management.

Private properties to the west of the WSAs are in mostly large holdings, and have limited public access. Little development is expected.

Thatcher Ridge WSA

See Eden Valley Alternatives Considered But Dropped From Further Analysis in Eden Valley above. No additional alternatives were considered for the Thatcher Ridge WSA because of the lack of significant resources and the absence of any boundary that would improve the quality of the wilderness values.

Chapter 2

Proposed Actions and Alternatives

CHAPTER 2

THE PROPOSED ACTION AND ALTERNATIVES

Since the pattern of future actions within the WSAs cannot be predicted with certainty, we have made projections of management actions to allow the analysis of impacts under the Proposed Action and alternatives. These projections are the basis of the impacts identified in this EIS. They represent reasonably feasible patterns of activities which could occur under the Proposed Action and alternatives analyzed.

EDEN VALLEY WSA
(CA-050-214)

PROPOSED ACTION (NO WILDERNESS/NO ACTION)

None of the 6,674 acres of public land in the Eden Valley WSA are recommended for wilderness designation. Under this proposal the lands would be managed in accordance with the existing East Mendocino Management Framework Plan (Map 2). Under the Proposed Action, none of the lands within the WSA would be designated wilderness. The WSA would remain open to recreational ORV use although no facilities would be built now or in the foreseeable future because of the low visitor use the area receives. Full fire suppression using mechanized equipment would be practiced and existing livestock use would be maintained at the existing level of 27 animal unit months.

Recreational Use Management Actions

The lands within the WSA would remain open to recreational ORV use. Approximately 25 visitor days of ORV use annually are currently occurring in the WSA. Projections for the foreseeable future indicate that recreational use would increase slightly, but would remain at levels below 50 visitor use days annually.

Five miles of rugged jeep trail exist in the WSA. No other development of ways or roads is anticipated because of the low use the area receives (See Map 4).

The WSA would also be open for nonmotorized recreation activities including fishing and hiking. Recreational use for these activities would remain constant at levels below 30 visitor use days annually. No recreational facilities or trails exist in the WSA and none are planned. Development of recreation facilities such as campgrounds is not anticipated because of the low use the area receives.

Vegetation Management Actions

Under this alternative, prescribed burns would be allowed to maintain fire-dependent ecosystems--primarily the chaparral found throughout the area. A field inventory will be conducted to identify the location of sensitive plant species or their habitat to monitor the effect of fire. Approximately 150 acres would be burned every five years.

Fire Management Actions

Wildfire suppression would be practiced in the Eden Valley WSA until a resource area fire management plan is completed. It is anticipated that this plan will allow the use of mechanized equipment. Full fire suppression would prevent the spread of fire onto private land. Support facilities for fire fighting would involve the use of public lands within the WSA. No presuppression activities will be conducted until a field inventory is completed (see Vegetation Management Actions). The 5 miles of existing firebreaks would not be maintained but allowed to return to their natural state. No new firebreaks will be cleared.

Wildlife Management Actions

Other than manually removing stream barriers in Deep Hole and Ellis Creeks to maintain the quality of the anadromous and native fish habitat, no other management actions are planned.

Grazing Management Actions

Approximately 1,000 acres of the Eden Valley WSA would continue to be used for livestock grazing. Projections beyond planning estimates indicate that livestock use would be maintained at the existing level of 27 animal unit months (AUMs) for cattle for the next eight years and beyond. No additional range developments would be constructed in the WSA, and maintenance activities would not change.

Land Tenure Adjustment Actions

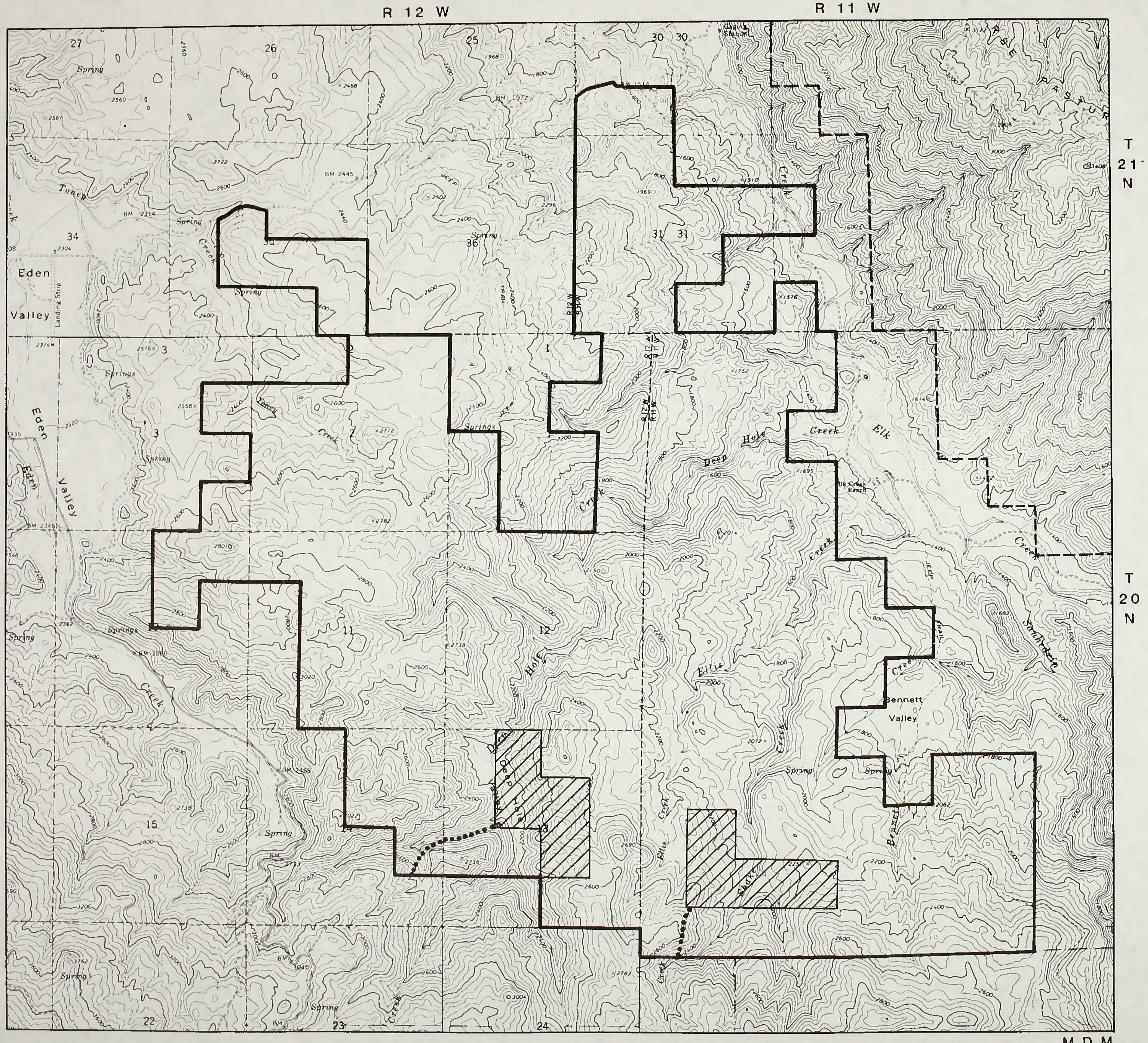
Under the Proposed Action, no attempt would be made to acquire the two 160-acre undeveloped parcels of private land within the WSA.

Mineral Development Actions

Although the potential for the occurrence of copper, manganese, chromite and platinum is low to moderate, no development of these minerals is anticipated because of better potential in more accessible areas outside the WSA and the lack of mining claims, exploration, or industry interest in the general area. With the exception of report of one small deposit of copper, located on private land within the WSA, there are no known mineral deposits. The California Division of Mines and Geology reports little interest expressed in minerals development or exploration in the area.

In the unlikely event mineral development did occur on public lands, the Bureau's regulations and policies and the impacts on the anadromous fisheries and the Eel River would be analyzed in specific activity plans and accompanying environmental documents.

The WSA is also classified as having high potential for the occurrence of coal. However, development is not anticipated because of the very low grade and probable small size of the deposit. No leasing activity has occurred in the area.



1 1/2 1 1 1/2 Mi.

SCALE 1:31,680
(2 inchs : 1 mile)

Contour Interval 40 Feet

N

LEGEND

Suitable Boundary (Entire WSA)

▨ Private Inholdings

•••••••••••• Private Property Access

– – – – – Thatcher Ridge WSA Boundary

EDEN VALLEY WILDERNESS STUDY AREA

CA-050-214

All Wilderness Alternative

(Under the PROPOSED ACTION
No Wilderness/No Action,
none of the area would be
designated Wilderness)

Map 2

ALL WILDERNESS ALTERNATIVE

All 6,674 acres of public land in the Eden Valley WSA would be recommended as suitable for wilderness designation (Map 2). Under this alternative, the firebreaks and jeep trails in the WSA would be closed to vehicular use and used as foot trails except those routes necessary to access private property. Discretionary management actions would be permitted only to preserve wilderness values. Private access would be provided to the two 160-acre private parcels in the southern portion of the WSA along existing ways. These parcels are currently undeveloped and there are no plans to develop them.

Recreational Use Management Actions

The Eden Valley WSA would be closed to recreational ORV use eliminating an estimated 25 visitor days of recreational ORV use that occur in the area annually. Under this alternative the WSA would be managed to provide a primitive setting and to allow nonmotorized recreational pursuits such as fishing, hiking, and primitive camping. Projections indicate that non-motorized recreation use would increase slightly, but would remain at levels below 50 visitor days annually for the foreseeable future. No recreational facilities exist and none are planned because of the low use the area receives. Five miles of jeep trails exist in the WSA which will be used for hiking trails, but no maintenance will be performed other than by volunteers using hand tools and no new trails will be constructed.

Vegetation Management Actions

Under this alternative, prescribed burns would be allowed to maintain fire-dependent ecosystems. Helicopter/helitorch would be used, but no mechanized ground equipment. Field inventory will be conducted to identify the location of sensitive plant species or their habitat to monitor the effect of fire. As in the Proposed Action, approximately 150 acres would be burned every five years.

Fire Management Actions

Under the All Wilderness Alternative, a fire management plan would be written for the WSA. It would become an addendum to the Wilderness Management Plan. Fixed-wing aircraft, helicopters, and ground crews would be used for fire control. Cross-country vehicle travel would be permitted only when the terrain and soil conditions would permit such travel without damage to vegetative cover and only with the approval of the District Manager. Heavy equipment such as tracked vehicles and dozers would not be permitted except to prevent loss of human life or to protect private or high-value property. Existing firebreaks throughout the WSA would no longer be maintained but allowed to return to their natural state.

Wildlife Management Actions

Stream barriers in Deep Hole and Ellis Creeks would be manually removed to maintain the quality of the anadromous and native fish habitat.

Grazing Management Actions

Grazing management actions under this alternative would be the same as those described for the Proposed Action, p. 2-2.

Land Tenure Adjustment Actions

Under the All Wilderness Alternative, every effort would be made to acquire the two 160-acre private parcels within the WSA. Private access would be provided to the parcels until they are acquired along existing ways.

Mineral Development Actions

Upon designation of the area as wilderness, all 6,674 acres would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. There are no valid existing rights; therefore, no development is projected.

THATCHER RIDGE WSA
(CA-050-212)

PROPOSED ACTION (NO WILDERNESS/NO ACTION)

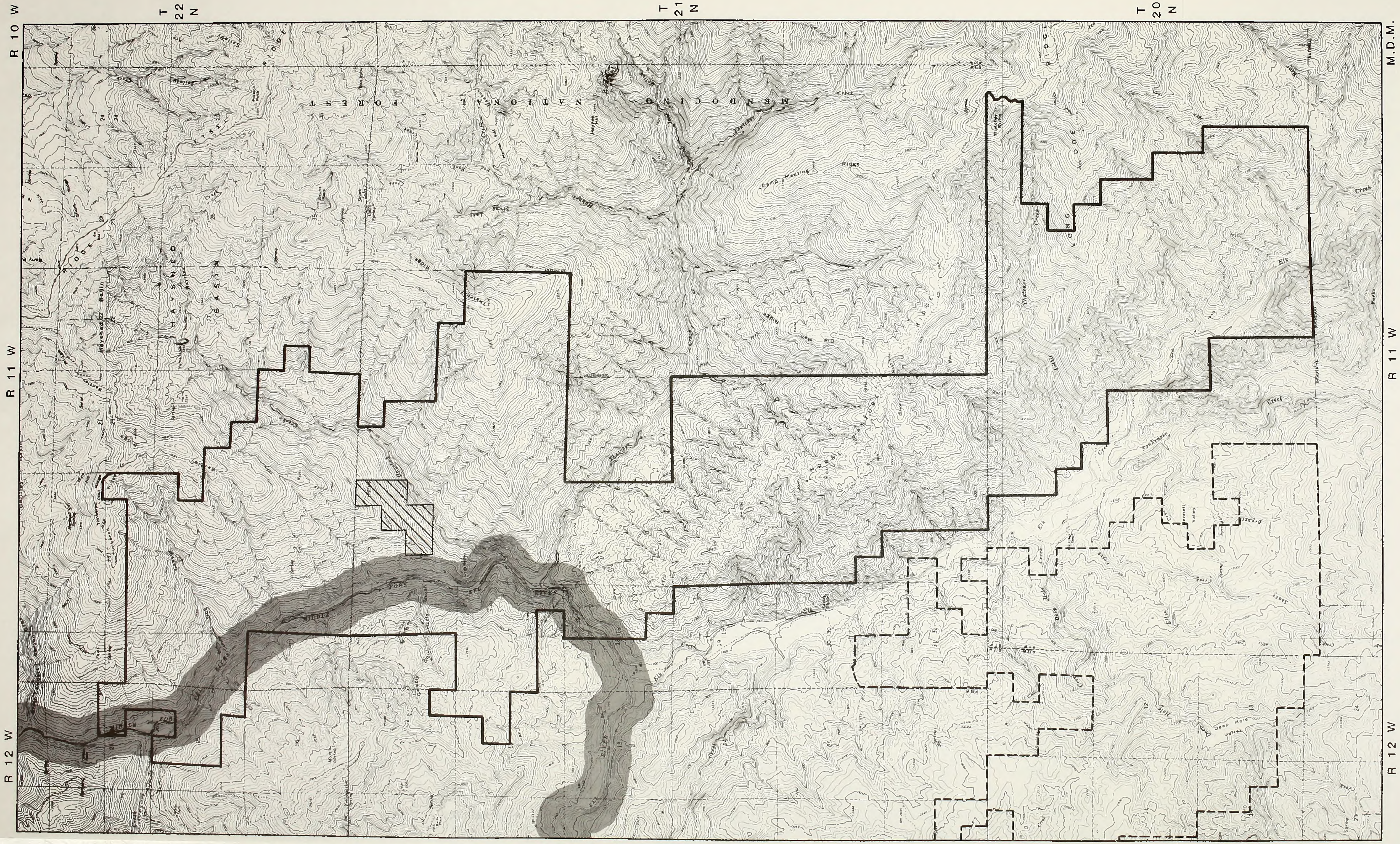
None of the 17,187 acres of public land in the Thatcher Ridge WSA are recommended for wilderness designation. Under this proposal the lands would be managed in accordance with the existing East Mendocino Management Framework Plan with the exception of the Middle Fork of the Eel River Wild and Scenic corridor. This corridor will be managed in accordance with the Department of Interior's Wild and Scenic River Guidelines (Federal Register, Vol. 47, No. 173) until a corridor management plan is completed in 1987. These guidelines, included in the management actions below, provide that the river corridor will be managed "in such a manner as to protect and enhance" its scenic quality (Map 3). Under the Proposed Action none of the lands within the WSA would be designated wilderness.

Recreational Use Management Actions

With the exception of the public lands within the wild and scenic corridor of the Middle Fork of the Eel River, the lands within the Thatcher Ridge WSA would remain open to recreational ORV use. Approximately 50 visitor use days of ORV use are currently occurring annually in the WSA. Projections indicate that recreational use would increase slightly, but would remain at levels below 75 visitor use days annually for the foreseeable future. Limited access will preclude any significant increases in ORV use.

Approximately 11 miles of jeep trails exist in the WSA. No other development of ways or roads is anticipated because of the low use the area receives. (See Map 5, Existing Resources - Thatcher Ridge.)

The WSA, including the Middle Fork of the Eel River, would be open for nonmotorized recreation activities including sport fishing, whitewater rafting and kayaking, wildlife observation, and backpacking. Recreational



N

1 1/2 0 1 MI.

SCALE 1:48,000
(1 inch : 4,000 feet)

Contour Interval 40 Feet

LEGEND

—— Suitable Boundary (Entire WSA)

- - - Eden Valley WSA Boundary

▨ Private Inholdings

▩ Wild and Scenic River

THATCHER RIDGE WILDERNESS STUDY AREA

CA-050-212

All Wilderness Alternative

(Under the PROPOSED ACTION
No Wilderness/No Action
none of the area would be
designated Wilderness)

Map 3

use for these activities would remain constant at levels below 200 visitor use days annually and would be restricted to favorable water conditions, usually during spring and fall.

No recreational facilities or hiking trails exist in the WSA and none are planned. Development of recreational facilities such as campgrounds is not anticipated because of the low use the area receives.

Vegetation Management Actions

Under this alternative, disturbed or burned areas would be mechanically reseeded to stabilize the soils in the area to lessen the chance of soil erosion. Prescribed burns would be used to maintain the natural condition of chaparral. Approximately 400 acres would be burned every two years.

Timber Harvest Management Actions

Under the Proposed Action 670 acres containing 5 MMBF of Douglas-fir would be logged. This would require construction of 3 to 4 miles of main line roads and spur roads. Logging would be done predominantly by tractor and would occur over a period of two years. The amount of timber to be harvested within the viewshed of the Wild and Scenic River corridor will be determined when the corridor management plan is completed in 1987. Generally, a minimum corridor of 1/4 mile on each side of the river will be zoned for no development.

Approximately 200 acres of land within the area would be manually replanted with Douglas-fir.

Fire Management Actions

Fire suppression would be practiced in the Thatcher Ridge WSA until a resource area fire management plan is completed. It is anticipated that this plan will allow the use of mechanized equipment. No vehicles would be allowed off the existing jeep trails within the Wild and Scenic River corridor. Full fire suppression would prevent the spread of fire onto private land. Support facilities such as helipads would involve the use of public lands within the WSA. No roads or trails would be improved for fire management. A total of 400 acres, dispersed throughout the lower portion of the WSA, would be burned to reduce fuel load. These presuppression burns would be limited to 15- to 20-acre patches in order to minimize any possibility of erosion and would be conducted using helicopter/ helitorch and ground crews with hand tools.

Wildlife Management Actions

Other than manually removing any stream barriers, no wildlife management actions would occur.

Grazing Management Actions

Approximately 7,000 acres of the Thatcher Ridge WSA would continue to be allotted for livestock grazing. Projections beyond planning estimates indicate that livestock use would be maintained at the existing level of

405 animal unit months (AUMs) for cattle for the next eight years and beyond. Two existing stock ponds within the WSA would be maintained using a small tractor and a one half mile drift fence would be constructed for livestock management purposes. No additional range developments would be constructed in the WSA, and maintenance activities would not change.

Land Tenure Adjustment Actions

Under the Proposed Action, no attempt would be made to acquire the 200-acre, undeveloped parcel of private land within the WSA.

Minerals Development Actions

The potential for the occurrence of copper and manganese is low to moderate. No development of these minerals is anticipated because of their suspected low grade, the small size of the deposits and the better potential in more accessible areas outside the WSA. In addition, there has been no industry interest in the area, no exploration, no mining claims, and no known discovery. Lands within the Wild and Scenic River corridor are withdrawn from all forms of appropriation under the mining laws.

The WSA is also classified as prospectively valuable for geothermal resources, however, the potential for the occurrence of an economic resource is low. Geothermal indicia in the area are scarce and no exploration or leasing activity has occurred in the area.

ALL WILDERNESS ALTERNATIVE

All 17,187 acres of public land in the Thatcher Ridge WSA would be recommended as suitable for wilderness designation (Map 3). Under this alternative, the firebreaks and jeep trails in the WSA would be closed to vehicular use and used as foot and equestrian trails. Discretionary management actions such as the acquisition of the 200-acre private parcel located in the northern portion of the WSA would be permitted but only to preserve or enhance wilderness values. Private access would be allowed until the parcel is acquired.

Recreational Use Management Actions

The Thatcher Ridge WSA would be closed to ORV use eliminating 50 visitor days of recreational ORV use that are estimated to occur in the area annually. Under this alternative, the WSA would be managed to provide a primitive setting to allow nonmotorized recreational pursuits such as fishing, hiking, and primitive camping. Projections indicate that nonmotorized recreation use would increase slightly, but would remain at levels below 250 visitor days annually for the foreseeable future. No recreational facilities exist and none are planned because of the low use the area receives. Eleven miles of jeep trails exist in the WSA which would be used for hiking trails but no maintenance will be performed other than by volunteers using hand tools and no new trails would be constructed.

Vegetation Management Actions

Under this alternative, prescribed burns would be allowed to maintain the chaparral--a fire-dependent plant species found throughout the area. Helicopter/helitorch would be used, but no mechanized ground equipment. As in the Proposed Action, it is anticipated that 400 acres would be burned every two years.

Timber Harvest Management Actions

Under the All Wilderness Alternative the 670 acres and 5 MMBF of timber would be removed from sale/harvest. No replanting would be permitted for timber management purposes.

Fire Management Actions

The fire management actions under the All Wilderness Alternative would be the same as those described under the All Wilderness Alternative for the Eden Valley WSA, p. 2-5.

Wildlife Management Actions

Wildlife management actions under this alternative would be the same as those described under the Proposed Action p. 2-9.

Grazing Management Actions

Grazing management actions under this alternative would be the same as those described for the Proposed Action, pp. 2-9 and 2-10.

Land Tenure Adjustment Actions

Under this alternative, every attempt would be made to acquire via exchange the 200-acre undeveloped parcel of private land within the WSA. Private access would be provided to this parcel along existing ways until it is acquired.

Mineral Development Actions

Upon designation of the area as wilderness, all 17,187 acres would be withdrawn from all forms of appropriations under the mining and mineral leasing laws.

SUMMARY OF SIGNIFICANT IMPACTS

Tables 2-1 and 2-2 provide a comparative summary of the major impacts of the Proposed Action and the alternatives.

Table 1

Comparison of Impacts of the Proposed Action and Alternative for the Eden Valley WSA

Environmental Issue	Proposed Action (No Wilderness/No Action)	All Wilderness Alternative
Impact on Wilderness Values	As a result of the projected 50 visitor days annually in off-road vehicle use, prescribed burns on approximately 150 acres, and the small-scale mining development, there would be a minor* impact on naturalness, opportunities for solitude, and primitive or unconfined recreation on less than 5 percent of the area's 6,674 acres. There would be no significant impact on the Deep Hole Creek Canyon or on the bald eagle or peregrine falcon.	All wilderness values in the area would be retained. The area's naturalness and opportunities for solitude and primitive or unconfined recreation would receive a minor benefit from the closure of the area to 25 visitor days of ORV use and mineral exploration/development.
Impact on Sensitive Plant Species Habitat	Full fire suppression and the projected 50 visitor days of ORV use and the surface disturbance associated with these uses would have a slight adverse effect but would be mitigated by excluding these surface-disturbing activities once a field inventory is completed.	Designation would have a very minor positive impact by precluding ORV use and full fire suppression. Increased nonmotorized use would have no significant impact on these species.
Impact on Endangered Species	Bald eagles and peregrine falcons would be negligibly impacted by the noise and surface disturbance associated with occasional ORV and nonmotorized use disturbance. Prescribed burns would have a very minor short-term impact but would enlarge foraging areas thereby enhancing peregrine falcon habitat.	Minor beneficial impact on the bald eagles and peregrines from closure of area to vehicles and mining activity.

*Impact Definitions are found on Page 4-1

Table 2
Comparison of Impacts of the Proposed Action and Alternative for the Thatcher Ridge WSA

Environmental Issue	Proposed Action (No Wilderness/No Action)	All Wilderness Alternative
Impact on Wilderness Values	ORV use of less than 75 visitor days/year, timber harvest on 670 acres, and mechanized fire suppression activities would have a minor impact on the area's wilderness values. Prescribed burns would have a short-term impact on the natural scene but would benefit solitude and peregrine falcon foraging habitat. Wilderness values would also be enhanced by 200 acres of commercial tree plantings.	The elimination of 75 visitor days of ORV use, timber harvesting, and mechanized fire suppression activities would have a minor positive impact on wilderness values for the most part. The prohibition of 200 acres of planting would have a minor localized negative impact on the opportunities for solitude and primitive or unconfined recreation.
Impact on Riparian Habitat	Full fire suppression with mechanized equipment, continued ORV use, and timber harvest and the noise and surface disturbance associated with these uses would have a minor impact on 3 miles of riparian habitat. Habitat would benefit from prescribed burning because of the reduction of fuel loads and the incidence of catastrophic wildfires.	Elimination of 75 visitor days of ORV use, recreation development, and prohibition of timber harvesting on 670 acres, would reduce human influence and have a minor positive impact on riparian habitat.
Impact on Endangered Raptors	No significant impact. Projected ORV use and the noise associated with this use would have a negligible impact on bald eagles and the pair of peregrines nesting outside the WSA. Timber harvest would have a minor, short-term impact but would benefit peregrines by increasing their foraging area.	Designation would eliminate the projected 75 ORV visitor use days and benefit endangered species. Prescribed burning activities would especially benefit the peregrine falcons, increasing foraging range.

Table 2 (Continued)
Comparison of Impacts of the Proposed Action and Alternative
for the Thatcher Ridge WSA

Environmental Issue	Proposed Action (No Wilderness/No Action)	All Wilderness Alternative
Impact on Anadromous Fish Spawning & Nursery Streams	Prescribed burns and limited timber harvest activities may cause erosion and siltation which would have a minor, short-term negative impact on 3 miles of anadromous fish spawning and nursery streams. Effects would be minimized by required management actions regulating timber harvest.	The elimination of 75 visitor days of ORV use on 11 miles of trails and firebreaks, and 670 acres of timber harvesting would reduce the possibility of increased erosion from surface disturbance and siltation, having a minor, positive impact on anadromous fish spawning and nursery streams. These streams may be impacted by prohibiting tree planting in disturbed areas in the drainage.
Impact on Timber Management	670 acres (5 MMBF) of Douglas-fir commercially harvested; 200 acres replanted.	5 MMBF of Douglas-fir foregone. Replanting of 200 acres prohibited.

Chapter 3

Affected Environment

CHAPTER 3

AFFECTED ENVIRONMENT

This chapter briefly describes each WSA and the resources that could be affected by the Proposed Action and alternatives.

More detailed descriptions of the resources in the study area and the regional socioeconomic conditions may be found in the planning documents for the area. Copies of these documents may be reviewed in the Ukiah District Office and the Arcata Resource Area Office.

EDEN VALLEY WSA
(CA-050-214)

The Eden Valley WSA contains 6,674 acres and is located east of Eden Valley and west of the Elk Creek drainage. Private lands surround the majority of the unit. The Mendocino National Forest is contiguous to the south.

Thick brush occurs over most of the area. Some grassy meadows with hardwoods are dispersed throughout the area. Large stands of cypress exist in the northern portion of the WSA. These trees are part of a larger stand which extends to the north beyond the WSA representing one of the most extensive stands of this species known. Elevations range from 1,000 feet along Elk Creek to 2,800 feet above Toney Creek. Most of the major drainages run east into Elk Creek, which runs north into the Middle Fork of the Eel River.

WILDERNESS VALUES

Naturalness

The Eden Valley WSA generally appears to have been affected primarily by the forces of nature, with human influences unnoticeable for the most part. One major canyon is within its border--Deep Hole Creek. This canyon which contains steep, forested terrain, averages between 200 feet and 400 feet deep. It is a good example of land that has retained its primeval character.

Most of the existing human imprints in the Eden Valley WSA are the 5 miles of firebreaks and rugged jeep trails along several ridges and dispersed throughout the area. These intrusions, however, are minor imprints on the landscape and are substantially unnoticeable.

Solitude

Opportunities for solitude are available throughout the WSA because of the topographic variations and vegetative screening. Deep Hole Creek, which bisects the WSA in a north/south direction, offers the best opportunity for seclusion and a feeling of isolation because of its steep hillsides and the abundance of Douglas-fir along the drainage. Much of the area, however, is covered with low-lying dense brush with minimal topographic variations.

Primitive or Unconfined Recreation

The area offers limited opportunity for users to participate in primitive or unconfined recreational activities such as hiking, fishing, and hunting. Much of the area is covered with very dense, low-lying brush forming natural barriers that restrict human movement within the area. Visual amenities are minimal due to uniformity and landform characteristics.

Special Features - Endangered Raptors

Bald eagles and peregrine falcons, both classified as endangered species, migrate through the area. One pair of peregrine falcons is known to nest in the area to the north of the WSA. Elk Creek, located in the northeastern portion of the WSA is a major salmon and steelhead spawning and nursery tributary. Deep Hole Creek is a productive small stream, primarily for steelhead and resident rainbow trout.

LAND OWNERSHIP

The Eden Valley WSA contains 6,674 acres of public land. There are two, undeveloped 160-acre parcels of private property in the southern portion of the WSA. Eden Valley Ranch is contiguous to the west. The ranchland was once planned for subdivision into 20- to 40-acre parcels. Private lands surround the remainder of the unit, except for a small amount of National Forest lands to the south. Access across the private lands surrounding the unit is restricted. Access to the two 160-acre inholdings is along existing ways.

CULTURAL RESOURCES

The WSA falls within the ethnographic territory of the Yuki tribelets of Witukomno'm and, possibly, Kilikuno'm (Kroeber 1925: 165). These people and their predecessors likely used the study area primarily for the collection of upland flora and fauna to satisfy their subsistence needs. Major areas of habitation occurred immediately east and west of the study area in Elk Creek and Eden Valley respectively (King 1966; Treganza, Smith, and Weymouth 1950).

A very small amount of acreage within the study area falls within the Elk Creek Canyon proper. Although no prehistoric sites were found in this area by an early inventory effort (King 1966), the presence of three juxtaposed habitation sites (CA-MEN-638, 639, 650) would indicate a potential for archaeological values associated with the utilization of riparian and northern oak woodland communities including fish and acorns, respectively. The balance of the study area has a potential for task-specific and perhaps temporary occupation loci based on the presence of abundant water, relatively flat expanses, and a heterogeneous interplay of vegetation communities.

Historically, the region was utilized for homesteading, ranching, and agricultural purposes. An abandoned homestead discovered by BLM personnel on the northern periphery in 1985 attests to this use. Major settlement occurred during the 1870's and 1880's. Two private inholdings, Deep Hole Valley and Shake Creek, were both purchased in 1884. Virtually no mining has occurred within the study area and the only enduring historic use was, and is, grazing. In 1914, the U.S. Forest Service applied for a withdrawal of 120 acres on Ellis Creek for the Bear Valley Ranger Station. The facility was never developed.

RECREATION

Recreation use in the Eden Valley WSA is minimal consisting primarily of deer hunting, ORV riding, and some fishing for resident trout along Deep Hole Creek. There is no solid data to determine levels of use. However, based on the area's remoteness and inaccessibility due to lack of public access, observations by BLM personnel while in the area, and the lack of evidence of vehicle use, it is estimated that there are less than 25 visitor days per year.

Deep Hole Creek is a productive small stream primarily for steelhead and resident rainbow trout. Because of the remoteness of the area, successful reproduction, and low public presence, fishing is excellent.

VISUAL RESOURCES

Because of the close proximity of the Eden Valley and Thatcher Ridge WSAs and their inclusion in the same scenic quality rating units (SQRUs), this description of Visual Resources applies to both WSAs.

The Eden Valley and Thatcher Ridge WSAs are within two scenic quality rating units. The Horse Pasture/Bentley Ridge SQRU encompasses the majority of the study area. The Middle Fork Eel River SQRU delineates the scenic corridor of the designated wild and scenic river which runs an approximate 5-mile stretch through the Thatcher Ridge WSA.

The Horse Pasture/Bentley Ridge SQRU is predominantly a landscape characterized as mixed chaparral covered ridges with isolated pockets of oak grasslands/woodlands as well as mixed conifers in the drainages with north and east aspects. The colors are generally muted grey-green to blue-green with seasonal grassland variations from green to golden tan. Elk Creek snakes between the two WSAs with side drainages such as Deep Hole Creek, Thatcher Creek, and Little Thatcher Creek cutting deeply into the more dominant ridges. These streams, while adding some diversity and contrast to an otherwise homogenous landscape, are not dominant features. Cultural modifications for the most part are limited to firebreaks and fuelbreaks, and are not strongly seen as contrasts within the characteristic landscapes. Overall, the area lacks diversity.

The visual resource management class is VRM Class 4. This rating is based on a moderate visual sensitivity level and reflects users' concern for the visual character and limited use volume. Most users view the area as background, if not seldom seen, as they hike/backpack through adjacent U.S. Forest Service lands to the east.

As a wilderness study area, the entire area is managed under VRM Class 2 guidelines to afford the study area an additional level of protection during interim management.

The Middle Fork Eel River scenic quality rating unit provides delineation of the designated wild and scenic river corridor (1/2 mile wide). As a wild and scenic river, the Middle Fork is managed as a special area designated VRM Class 1. The scenic quality is rated as Class B based on the wild character of the river. The river adds a dominant feature to the typical landscape of the study area as described for the Horse Pasture/ Bentley Ridge SQRU. The river not only adds the characteristic of the swift flowing water, but also associated riparian vegetation, gravel bars and rock outcroppings.

TIMBER RESOURCES

Suitable commercial forest land (CFL) consists of several isolated parcels, totaling 523.37 acres, along the southern portion of the WSA. Species composition is predominantly Douglas Fir and cypress. Because of the widely scattered, sparse stands, distance from market, and access problems, the stands are not manageable as CFL. The low volume of hardwoods and distance and access problems indicate no viable, economic resource.

VEGETATION

Eden Valley WSA is divided into two basic categories of vegetation, those plants which occur on ultrabasic soils and those occurring on soils derived from sedimentary parent material. The vegetation inhabiting the ultramafic substrate is unique and somewhat uncommon, and can best be classified into two vegetation types: northern interior cypress division of the closed-cone coniferous forests and serpentine chaparral. Meyer (1979) observed the following major taxa associated with this "cypress community": Sargent cypress (*Cupressus sargentii*), leather oak (*Quercus durata*), whiteleaf manzanita (*Arctostaphylos vicida*), chamise (*Adenostoma fasciculatum*), wedgeleaf ceanothus (*Ceanothus cuneatus*), knobcone pine (*Pinus attenuata*), and Digger pine (*P. sabiniana*). The serpentine chaparral community shares many of the same species including chamise, leather oak, manzanita, and wedgeleaf ceanothus.

Environment

On the soils that are Franciscan in nature (i.e., sedimentary) exists a mosaic dominated by California mixed chaparral but including a substantial blue/northern oak woodland component, cismontane introduced grassland and a mesic phase of the mixed evergreen forest. The mixed chaparral community commonly consists of chamise, several ceanothus (_Ceanothus_ spp.), manzanitas and live oaks (e.g., _Q_. _chrysolepis_, _Q_. _wislizenii_, _Q_. spp.) while the blue/northern oak woodland is composed of deciduous oaks (_Q_. _douglasii_ and _Q_. _garryana_), Digger pine and live oaks with a grassland understory element. This understory has a species composition identical to that of the cismontane introduced grassland which is one primarily annual in nature (_Bromus_ spp., _Festuca_ spp., _Avena_ spp.) but with a native perennial component (e.g., _Danthonia_ _californica_ and _Elymus_ _glaucus_). Finally, the mixed evergreen forest includes Douglas-fir (_Pseudotsuga_ _menziesii_), ponderosa pine (_P_. _ponderosa_), California black oak (_Q_. _kelloggii_), live oaks and Digger pine.

Botanical values within the WSA are limited to the ultrabasic substrate and do not include any federally listed endangered or threatened plant species or any candidates for such designation (_Federal_ _Register_, Vol. 45, No. 252, 15 December 1980). The most readily apparent botanical value is the large stand of Sargent cypress which occurs in the northwestern corner of the WSA (T. 20 N., R. 11 W., Sec. 2). These trees are part of a larger stand which extends to the north beyond the WSA representing one of the most extensive stands of this species known (Griffin and Critchfield 1972).

Sensitive Plant Species Habitat

Also of significance from a botanical perspective is the extensive rare plant species habitat which exists on the ultramafic soils. Although only the serpentine sunflower, _Helianthus_ _exilis_ (California Native Plant Society (CNPS), List 3, 1984) has been reported, an intensive field survey may yield other uncommon species. Several CNPS List 3 and 4 species, including the BLM-sensitive _Pogogyne_ _douglasii_ var. _parviflora_, have been reported on public lands immediately north of the WSA. (See Map 4, Existing Resources - Eden Valley WSA.)

SOILS AND WATERSHED RESOURCES

The soil map completed by the Soil Conservation Service in 1984 shows two mapping units covering about 85 percent of the area. Henneke, Montara, and Zenia are the soil series comprising these two mapping units. Ten other mapping units containing ten other series make up the remaining 15 percent of the area.

The area is part of the Middle Fork Eel drainage. Most of the area drains to the northwest via Deep Hole, Ellis, Shake, and Bennett Valley creeks all of which are tributaries of Elk Creek, a major tributary of the Eel. The north end of the area drains to the northwest via Toney Creek, a tributary of Eden Creek.

WILDLIFE

Because of the close physical proximity of the two WSAs and similar wildlife habitat and use patterns, the wildlife descriptions for the two WSAs have been combined.

Riparian Habitat

The Eden/Thatcher WSAs contain a variety of intermingled vegetation types and riparian areas which results in excellent habitat for a wide variety of wildlife species. According to California Wildlife/Habitat Relations Program, North Coast/Cascades Zone, at least 219 species could potentially use the areas' riparian habitats for breeding, feeding, or nesting (USFS 1979). Remoteness also adds to the areas' desirability for wildlife, particularly for the larger more wary species such as black bear, mountain lion and the larger raptors. The proximity of the Eden/Thatcher WSAs allows birds and the larger more mobile animals to include portions of both areas in their territories.

Endangered Raptors

The WSAs comprise a portion of a feeding territory used by a pair of peregrine falcons. Preferred foraging areas include the riparian zones and the more open oak-grassland vegetation types.

Bald eagles feed along the Eel River, Elk Creek and Thatcher Creek primarily during fall and winter. These birds respond to the availability of food present during the annual anadromous fish spawning runs.

Fully Protected Species (California Department of Fish and Game)

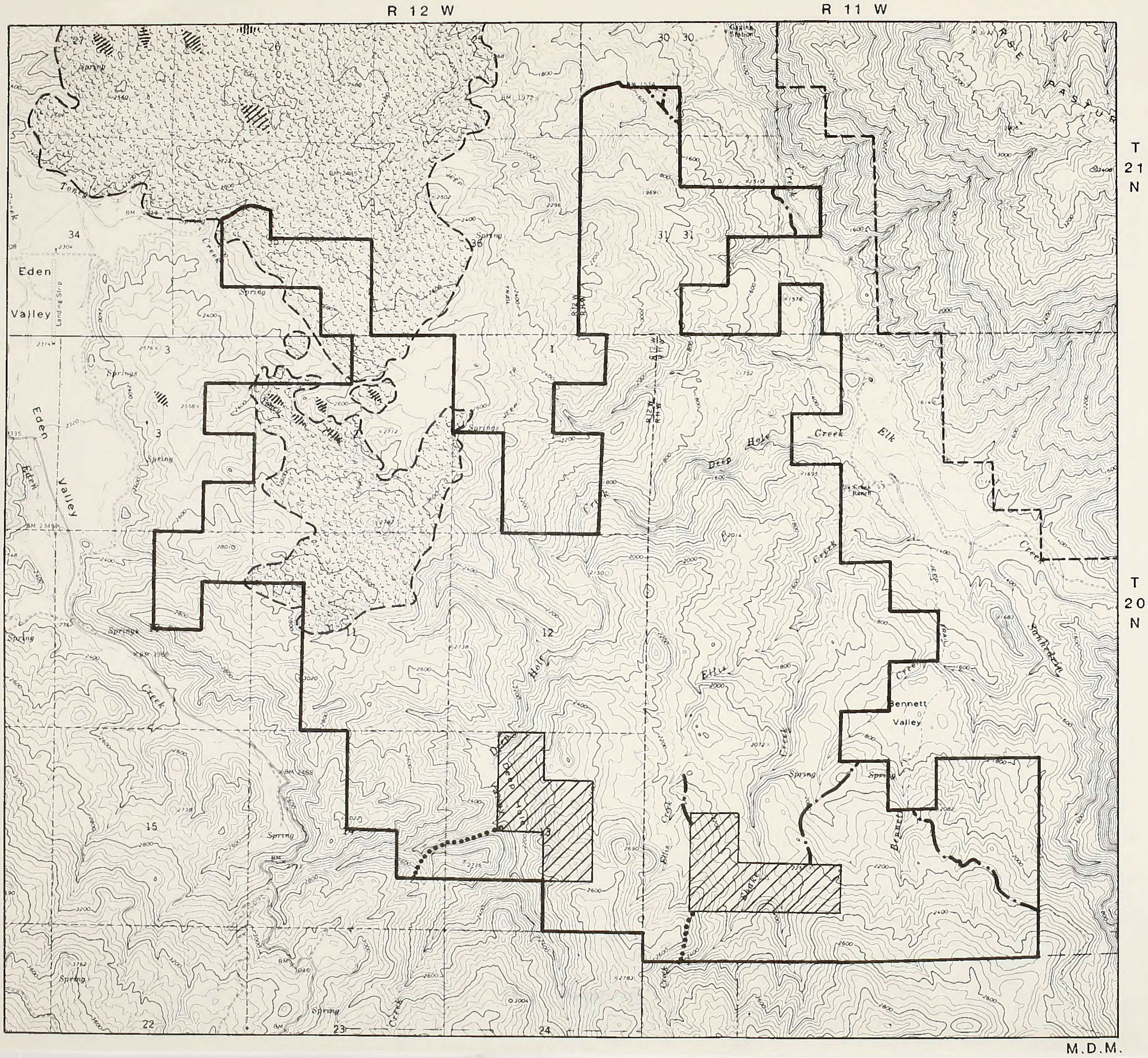
Suitable habitat is present for the golden eagle, black-shouldered kite and ringtail cat. The golden eagle ranges widely while the more open areas and riparian zones are preferred by kites. The ringtail cat is considered common along the Eel River (Schempf and White 1977).

Sensitive and Special Concern Species

The U.S. Fish and Wildlife Service (USFWS) considers the purple martin and western bluebird sensitive in Region 1 due to competition from starlings and widespread elimination of snags (USFWS 1982). Both species are expected in the area at least on a transitory basis. The California Department of Fish and Game (CDFG) has listed the sharp-shinned hawk and Cooper's hawk as species of special concern (Remsen 1978). The sharp-shinned hawk is expected to occur only as a transient; the Cooper's hawk is a resident species.

Game Species

The CDFG has classified most of the WSA as important winter deer range (CDFG 1979). The general area is considered good deer habitat but can be improved by continuing the ongoing program of burning overmature chaparral. If not grazed heavily, meadows in the vicinity of Ellis Creek and Bennett Valley are considered important fawning areas. A black bear concentration



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SCALE 1:31,680
(2 inches : 1 mile)

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LEGEND

▬▬▬	Eden Valley WSA Boundary
▨	Private Inholdings
••••••••••••	Private Property Access
- - - - -	Thatcher Ridge WSA Boundary
⁘	Sargent Cypress Groves
—·—	Ways
·||||·	Sensitive Plant Species Habitat (California Native Plant Society, List 3&4)

EDEN VALLEY WILDERNESS STUDY AREA

CA-050-214

Existing Resources

Map 4

area has been delineated along Elk Creek. The bears concentrate here primarily during fall and winter in response to anadromous fish spawning runs. The northern portion of the Thatcher Ridge WSA falls within a band-tailed pigeon concentration area which is centered primarily in Round Valley (CDFG 1979). Turkeys have been observed near the mouth of Elk Creek, but suitable habitat is limited.

Prominent small game animals in the area include squirrels, rabbits, and quail.

Other Notable Wildlife Species

The occurrence of so many permanent water sources and riparian zones enhances the areas' overall desirability for wildlife. Excellent habitat for semiaquatic species including river otter and mink is present. The osprey has also been observed using these areas but nesting is not known to occur.

The fisher, an unusual animal for this habitat area, has been sighted in the vicinity of Elk Creek (CDFG 1979). This animal is suspected to be only transient in the area with other specimens reported from near Covelo and Eden Valley (Schempf and White 1977, Hemphill 1952).

Limited use by tule elk has been observed in the Thatcher Butte area from animals that summer primarily on the Mendocino National Forest.

According to California Natural Areas Coordinating Council (1976), the Eden Valley area is probably the northernmost limit of the roadrunner.

Anadromous Fish Spawning and Nursery Streams

The Eden Valley and Thatcher Ridge WSAs comprise significant portions of the watersheds of three important anadromous fish spawning and nursery streams. Elk Creek is a major salmon and steelhead spawning and nursery tributary of the Middle Fork of the Eel River. Deep Hole Creek in the Eden Valley WSA is a productive small stream primarily for steelhead and resident rainbow trout. Thatcher Creek in the Thatcher Ridge WSA is primarily a steelhead spawning stream but king salmon and resident rainbow trout are also present. Ellis Creek in the Eden Valley WSA, a small tributary of Elk Creek, also contains small numbers of rainbow trout (BLM 1974).

MINERAL AND ENERGY RESOURCES

There is a moderate potential for the occurrence of copper, manganese, chromite, and platinum in the WSA. These minerals have been classified as critical and strategic by the U.S. Bureau of Mines. Several reported prospects or occurrences of copper are located southwest of Eden Valley outside the WSA. A small vein of copper was reported on private land within the present WSA in the early 1900's. Scattered manganese prospects are located throughout the area. These deposits are associated with metachert or metavolcanic rocks. Several prospects are located in the Sanhedrin Mountains southwest of Eden Valley, and minor manganese production was reported from a location 2 miles southwest of Deep Hole Valley. There are no known manganese occurrences within the WSA. Chromite deposits occur in lenticular serpentinite bodies associated with faults. Trace amounts of platinum are found with some of the chromite deposits in this area. Large serpentinite outcrops in the WSA provide a favorable environment for the occurrence of these metals. There are no mining claims in the WSA as of August 27, 1986.

The eastern half of the WSA is prospectively valuable for geothermal resources. No hot springs or other geothermal indicia are known to occur in the immediate area; however, a fault zone which runs along Elk Creek is associated with thermal springs to the southwest.

There are no saleable mineral deposits within the WSA. The WSA has little to no potential for oil or gas. A small area near Elk Creek Ranch is prospectively valuable for carbon dioxide.

There is a high potential for the occurrence of very low-grade coal in the western part of the WSA. Coal is reportedly present in the WSA just east of the town of Eden. Coal has been produced several miles west of Eden outside the WSA boundary.

The WSA has no known potential for the occurrence of other mineral resources.

LIVESTOCK GRAZING

Approximately 1,000 acres within the Eden Valley WSA were authorized for grazing use in 1981. This action was determined to be nonimpairing to wilderness suitability and was documented in an environmental assessment. The leased acreage within the WSA plus additional public land within the Thatcher Ridge WSA comprise the Horse Pasture Ridge Grazing Allotment (8,250 acres). A total of 27 animal unit months (AUMs) of forage are harvested annually from the Eden Valley WSA. No additional AUMs are proposed. A livestock grazing management plan with accompanying environmental assessment was developed in 1984. There are no existing range improvements within the WSA.

Photo 1 - Eden Valley WSA, Deep Hole Creek

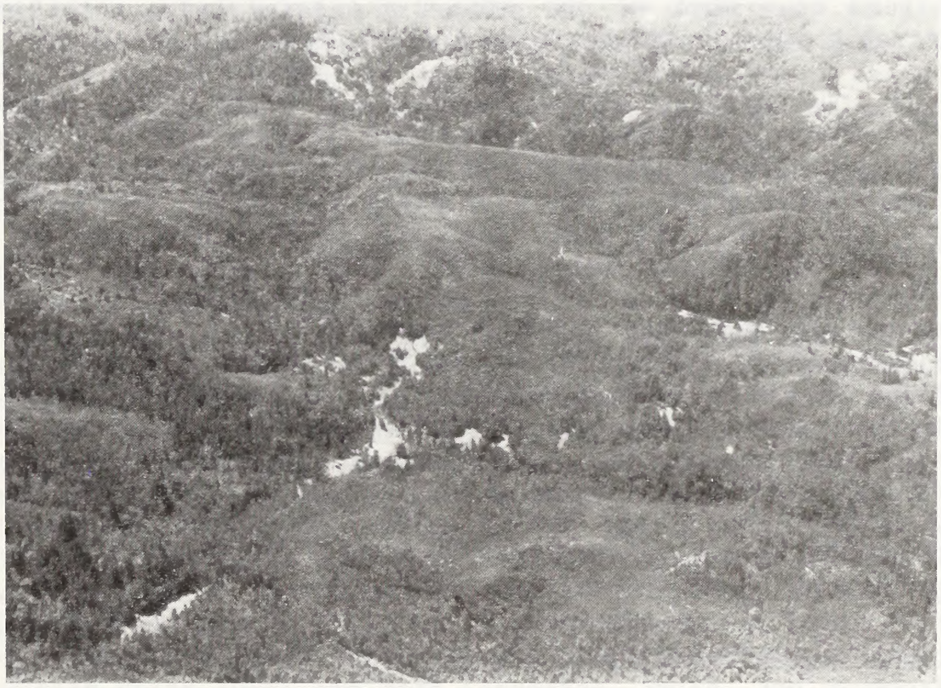


Photo 2 - Eden Valley WSA, Big Hole Creek Canyon with Ridge from San Hedrin Mountains in the background.

THATCHER RIDGE WSA
(CA-050-212)

The Thatcher Ridge WSA contains 17,187 acres and is located east of Elk Creek and west of Etsel Ridge. The northern boundary runs along Timbered Ridge and the eastern and southern boundary is contiguous to the Mendocino National Forest.

Most of the area is on a west-facing slope, with vegetation consisting mainly of chaparral. Hardwood and conifers cover east- and north-facing slopes. A few grassy meadows are scattered throughout the area. The north half is cut by the Middle Fork of the Eel River as it flows south. The southern part of this unit is drained to the northwest by Elk Creek. Abundant, steep, northwest faulting controls the topography.

WILDERNESS VALUES

Naturalness

Like the Eden Valley WSA, the Thatcher Ridge WSA appears to have been affected by the forces of nature, with human influences unnoticeable except in the southern portion of the area where the natural condition has been impaired by land manipulations such as herbicide spraying, drilling, and planting of non-native grasses. In addition, approximately 11 miles of firebreaks extend down most of the ridges and several traverse the slope creating noticeable intrusions when viewed from higher elevations.

The WSA contains two major canyons and a number of smaller ones. The Middle Fork of the Eel River has formed a canyon that is over 600 feet deep. The river gorge is steep and rugged and is an excellent example of land that has retained its primeval character.

Solitude

Opportunities for solitude are available throughout the WSA but are best along the Middle Fork of the Eel River. Thatcher Creek, Hayshed Creek, and Doe Canyon Creek also offer opportunities for solitude but their proximity to firebreaks and the occasional use of these firebreaks by off-road vehicles limit these opportunities. It becomes increasingly difficult to find seclusion in the WSA from the midslope of the ridge forming the western boundary of the WSA to the top of the ridge because of the lack of vegetative screening caused by several fires that have occurred in recent years.

Primitive or Unconfined Recreation

The Middle Fork of the Eel River offers excellent opportunities for primitive recreation such as whitewater boating; sport fishing for salmon, steelhead, and trout; wildlife observation; and backpacking. The remainder of the WSA offers limited opportunities because of its narrow configuration and very steep, brushy slopes.

Special Features - Endangered Raptors

Bald eagles and peregrine falcons, both classified as endangered species, migrate through the area. One pair of peregrine falcons is known to nest in the area to the northwest of the WSA. The Middle Fork of the Eel River flows for 5 miles through the WSA and has been designated a "Wild and Scenic" river under the Wild and Scenic River Act. The Eel is a major salmon and steelhead spawning and nursery river. (See Map 5, Existing Resources - Thatcher Ridge WSA.)

LAND OWNERSHIP

The Thatcher Ridge WSA contains 17,187 acres of public land. There is one undeveloped 200-acre parcel of private land in the northern portion of the WSA. It is bounded on the east and south by the Mendocino National Forest. Private lands form the boundaries around approximately half of the unit.

CULTURAL RESOURCES

The WSA falls within the ethnographic territory of the Yuki or Witukomno'm (Kroeber 1925: 161, 165). These people and their predecessors likely used the study area for the foraging of plant resources, hunting or trapping of upland fauna (including elk), and collecting of fish, especially during seasonal runs of anadromous species. Overall, the study area affords little potential for extensive use in prehistory as steep slopes, shallow soils, and chaparral vegetation typify the setting. Compounding this lack of natural abundance is the general absence of bedrock features and material suitable for the manufacture of stone tools.

Restricted areas did, however, afford opportunities for use as evidenced by recorded archaeological sites. A survey (King 1966) of the narrow canyon of the Middle Fork Eel River identified three small prehistoric middens or habitation sites. These sites (CA-MEN-630, 631, 632) were likely seasonal encampments for the express purpose of collecting fish and floral resources of the riparian zone and small pockets of northern oak woodland on which the known sites are located. It is very likely that several temporary use or single activity loci were located on the riparian terraces and midslope flats (especially at ecotones near water sources on south-facing slopes). It is likely that surface scatters of stone tools and their debris occur atop the only major, secondary ridge in the study area, i.e., Horse Pasture Ridge. The generally shallow soils argue against archaeological sites with depth although the flatter areas with Hopland-Maymen-Etsel soils complex may contain some archaeological sites with deposits perhaps as deep as 50 centimeters. A focused field inventory is necessary to test these assumptions and to balance the survey coverage within (King 1966) and near (Treganza, Smith, and Weymouth 1950) the study area.

A field investigation within the region was performed by BLM and Sonoma State University during June 1986. Inventory teams swept down Bentley and Thatcher ridges and portions of Hayshed Creek as part of the regional investigation. One broken chert tool was found during this effort bespeaking the low sensitivity of the majority of the WSA. During this effort, the teams noted heavy erosion from storm runoff in the Eel River Canyon. Indeed one previously recorded site, CA-MEN-631, has been erased since recordation.

Historically, the study area proper appears to have been scarcely used. The only private inholding (200 acres within Section 5, T. 21 N., R. 11 W.) encompasses a grassland and spring. The homestead and cash entry patents were filed in 1889 and probably relate to a homestead attempt for grazing or agricultural purposes. The study area offers no mineral resources which is indicated by a singular lack of mining-related features. The only historic feature found in the literature is a trail noted in the USGLO Cadastral Survey Plat of 1880. Possible traces of this trail were noted in a study of 1:12,000 color aerial photographs. The trail is symbolic of the historic use of the study area, i.e., an impediment to travel which had to be crossed on occasion.

RECREATION

Recreational use in the Thatcher Ridge WSA is concentrated along the course of the Middle Fork of the Eel River which flows through the northwestern edge of the WSA for approximately 5 miles. During favorable water and weather conditions, rafting parties and kayakers use the area.

Access is difficult, requiring permission from landowners to cross private property or to gain access by U.S. Forest Service roads from Etsel Ridge. While there are no visitor use statistics to determine levels of use, the area's remoteness and inaccessibility preclude extensive use. Observations by BLM personnel while in the area and the general lack of evidence of vehicle use on the firebreaks indicate low levels of use, estimated at less than 200 visitor use days per year. There are 11 miles of firebreaks and jeep trails which are occasionally used by four-wheel drive or all-terrain type vehicles. These users account for approximately 25 percent of the visitor use.

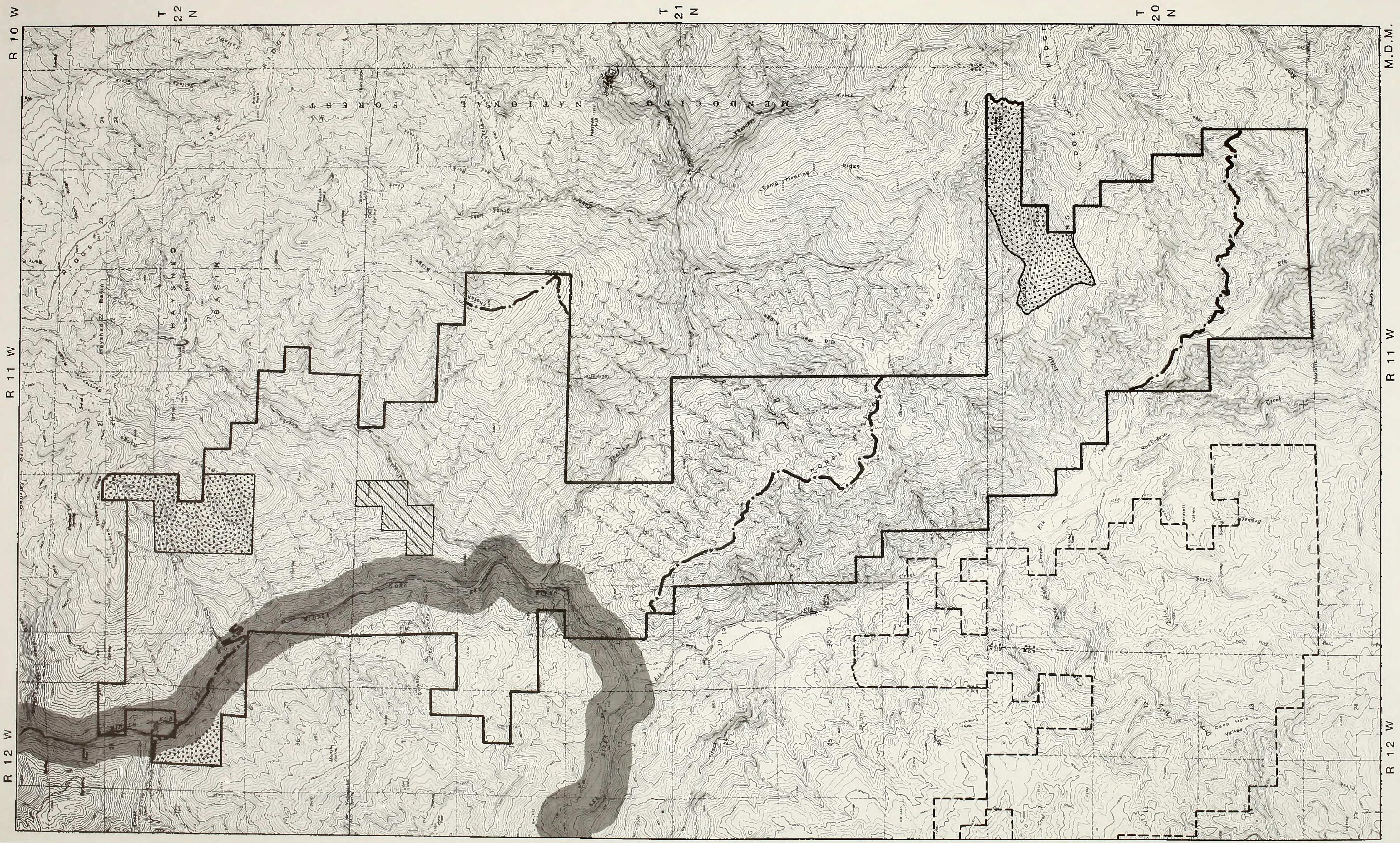
Deer hunting within the WSA is limited due to difficulty of access, steep topography, and dense, low-lying vegetation.

VISUAL RESOURCES

See Visual Resources section under the Eden Valley WSA, pp. 3-3 and 3-4.

TIMBER RESOURCES

The majority of the identified Commercial Forest Land (CFL) available for timber management within the WSA is in small isolated parcels of 10 to 50 acres in the northern and southern portions of the WSA. Approximately 670 acres (5 MMBF of standing merchantable timber) are available for harvest. (See Map 5, Existing Resources - Thatcher Ridge WSA.)



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(1 inch : 4,000 feet)

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LEGEND

- Thatcher Ridge WSA Boundary
- Eden Valley WSA Boundary
- ▨ Private Inholdings
- ▇ Wild and Scenic River
- ░ Commereial Forest Lands (CFL)
- Ways

THATCHER RIDGE WILDERNESS STUDY AREA

CA-050-212

Existing Resources

Map 5

The largest blocks of timber within the general area are outside the WSA on Timbered Ridge, 1 mile to the north of the WSA; Dingman Ridge, 10 miles to the northwest of the WSA; and Thatcher Butte, about 1 mile to the southeast of the area.

There are currently no roads capable of being used to haul timber from the area.

VEGETATION

The overwhelming majority of Thatcher Ridge WSA is composed of chaparral. Specifically, a complex of two chaparral types, California mixed chaparral and lower montane chaparral dominate the uplands which by in large have xeric soil moisture regimes. Characteristic taxa include chamise (_Adenostoma fasciculatum_), ceanothus (_Ceanothus_ spp.), manzanita (_Arctostaphylos_ spp.), mountain mahogany (_Cercocarpus betuloides_), and an assortment of live oaks (_Quercus_ spp.).

At lower elevations in a zone transitional between the chaparral uplands and the perennial streams of the Eel River and Elk Creek frequently occurs the blue/northern oak woodland. This community commonly consists of Digger pine (_Pinus sabiniana_), Oregon white oak (_Q. garryana_), blue oak (_Q. douglasii_) and live oaks (_Q. chrysolepis_, _Q. wislizenii_, _Q._ spp.). A xeric phase of the northern oak woodland consisting of Digger pines, live oaks and depauperate Douglas-fir (_Pseudotsuga menziesii_) occurs as sparse stringers in the more mesic upland drainages.

Two small areas of coniferous forest exist within the WSA. In the general vicinity of Thatcher Butte in the south (40 acres) and in the extreme northern portion of the WSA at Timbered Ridge (80 acres) occurs a complex mixed conifer situation which can best be classified as a coast range mixed conifer community. This forest is typified by Douglas-fir, sugar pine (_Pinus lambertiana_), ponderosa pine (_P. ponderosa_) and California black oak (_Q. kelloggii_). Appearing at the higher elevation sites is white fir (_Abies concolor_), while at lower elevation sites there is an increase of hardwoods such as madrone (_Arbutus menziesii_).

No significant botanical values exist. This includes an absence of both federally listed endangered/threatened plant species and Federal candidate species (_Federal Register_, Vol. 45, No. 242, December 15, 1980).

SOILS AND WATERSHED RESOURCES

A soil survey (inventory) of the area was completed in 1984 by the Soil Conservation Service. It is shown on the Thatcher Ridge and Sanhedrin Mtn. U.S.G.S. 7 1/2 minute quadrangle maps.

The soils are relatively uniform. Three mapping units consisting of four soil series predominate. In order of extent these series are: Maymen, Hopland, Etsel, and Snook. Slopes are almost all 30 to 50 percent. A few areas have slopes up to 75 percent. Minor amounts of twelve other soil series are also mapped.

The trellis drainage pattern typical of the rest of the North Coast Province is evident here too. The dominant directions of streams follow the northwest to southeast trend of the major ridges.

Stream flow and sediment yield data are known because the U.S.G.S. has gauging stations on the Middle Fork Eel below Black Butte River above the WSA and Dos Rios a short distance below. The intervening watershed had an average annual sediment yield of 2.1 acre feet per square mile. This is slightly lower than the average for the entire Eel River. This is probably due to having fewer roads and less timber harvesting than some other parts of the Eel watershed.

WILDLIFE

See Wildlife section under Eden Valley WSA, pp. 3-6 and 3-9.

MINERAL AND ENERGY RESOURCES

There is a moderate potential for the occurrence of copper and manganese in the WSA. Several reported occurrences of these metals are located in the area, although there are no known occurrences within the WSA. However, the geologic environment in the WSA is similar and contiguous to that in which deposits of copper and manganese are found. No mining claims are recorded in the WSA as of August 27, 1986.

Most of the WSA is prospectively valuable for geothermal resources. No hot springs or other geothermal indicia are known to occur in the immediate area; however, a fault zone which runs along Elk Creek is associated with thermal springs to the southwest.

The only saleable mineral deposits are on the Eel River, and the River's Wild and Scenic Status precludes any extraction.

The WSA has no known potential for other mineral resources.

LIVESTOCK GRAZING

Approximately 7,000 acres of the Horse Pasture Ridge Grazing Allotment lie within the Thatcher Ridge WSA. Grazing use was originally authorized in 1972. An allotment management plan (AMP) was developed for the area in 1984 authorizing harvest of 405 animal unit months (AUMs) annually. Presently, there exist two stock ponds (T. 21 N., R. 11 W., Sec. 32, NW1/4 and T. 20 N., R. 11 W., Sec. 2, W1/2) and a boundary fence in poor condition (T. 21 N., R. 11 W., Secs. 27 and 28) within the WSA.

Photo 3 - Thatcher Ridge WSA, Eel River and Thatcher Creek

Photo 4 - Thatcher Ridge WSA, Horse Pasture Ridge

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

This chapter focuses directly on the issues identified in Chapter 1. For each WSA the environmental impacts of each alternative are described issue by issue. The environmental impacts of these alternatives on the areas' other resources have also been analyzed and have been found to be insignificant.

Because of the general nature of this analysis and the lack of numerical and statistical information regarding the areas' resources, impacts in this chapter are often expressed in relative terms. For the purpose of this analysis the meanings of these terms are as follows:

- Negligible impact - the degree of anticipated environmental impact is considered less than minor.
- Minor impact - comparatively unimportant; in terms of the area's wildlife resources, a minor impact is one affecting a specific group of individuals of a population in a localized area for one generation or less; the integrity of the regional population is not likely to be affected.
- Moderate impact - an effect sufficient enough to cause a change in the abundance of a resource or its distribution. In terms of the area's wildlife, the abundance or distribution of a portion of the regional or local population would change over more than one generation, but would not affect the integrity of the regional population as a whole.
- Major impact - an effect sufficient enough to cause a decline in the abundance of a resource or a change in distribution of a resource. In terms of the area's wildlife, the abundance or distribution of the regional or local population of a species would decline beyond which natural recruitment would not likely return that population to its former level within several generations.

EDEN VALLEY WSA
(CA-050-214)

PROPOSED ACTION (No Wilderness/No Action)

Under the proposed action, the entire 6,674 acres of the Eden Valley WSA would be recommended as unsuitable for wilderness designation.

The primary impacts under this proposal relate to wilderness values and sensitive plant species habitat.

Impact on Wilderness Values

None of the WSA would be recommended as suitable for wilderness designation and none of the wilderness values on 6,674 acres would receive the special legislative protection provided by wilderness designation. The short-term impacts (0-5 years) and foreseeable long-term impacts (5 or more years) of this action would be negligible, since little development activity or increased motorized recreational use is anticipated whether or not the area is designated wilderness.

- Naturalness

The presence of off-road vehicles and the 5 miles of existing jeep roads and firebreaks would impair the perception of naturalness on 150 to 200 acres of the WSA. Heavy vegetative cover, natural reclamation of the jeep trails and firebreaks, and present and projected low levels of use (less than 50 visitor use days annually) would minimize reduced values. The lack of recreation developments would maintain existing naturalness values.

Surface disturbance and construction activities associated with the low level mineral exploration and development in the WSA would impair the natural character of 15 acres around the mining operation and the perception of naturalness on 200 acres in the southern portion of the WSA. Impacts on naturalness from these activities are not expected to be significant over the long term because they are dispersed and isolated and will be noticeable only in the area of disturbance.

Fire suppression would have a minor, short-term impact on the area's naturalness if mechanized ground equipment is used, but would be reduced by post-suppression reclamation (rehabilitation by harrowing and hand seeding). Prescribed burns would have a negligible impact on 150 acres burned every five years. These burns would be limited to 15- to 20-acre patches to minimize any impact.

- Solitude

Occasional off-road vehicle use would detract from the feeling of solitude on approximately three percent of the WSA; however, the low level of ORV use, both present (approximately 25 visitor use days annually) and projected (less than 50 visitor use days), natural rehabilitation of the 5 miles of jeep trails and firebreaks, and dense vegetation would lessen these impacts.

While there is a low to moderate potential for the occurrence of copper, manganese, chromite and platinum, the potential for exploration is low, thereby eliminating concern for adverse impacts on a visitor's opportunities for solitude.

- Primitive or Unconfined Recreation

  The projected 50 visitor days of ORV use would diminish the opportunity for primitive or unconfined recreation for those visitors close to the 5 miles of jeep trails and firebreaks on approximately 100 acres. Dense vegetation and the natural revegetation of existing jeep trails and firebreaks would lessen the level of impact.

- Special Features

  The present and projected levels of off-road vehicle use, cited above, would have minor impacts on the bald eagle and peregrine falcon. The terrain, dense vegetation, and restricted access along the Deep Hole Creek drainage would preclude any ORV use and any significant impacts on the steelhead and resident trout habitat.

  Surface disturbance, noise, traffic and construction associated with the low-level exploration and development of the area's resources would be located in the southern portion of the WSA and would have no significant impact on the peregrine falcons' foraging area or the Deep Hole Creek drainage located several miles to the west of the potential development. The general locale is used by the peregrine falcon for foraging, and small, scattered developments would have no effect on their foraging abilities. There are no known peregrine nests in the WSA, and bald eagles are winter residents only and do not nest in the area. The bald eagle is found only around water sources with a ready supply of fish.

  Fire suppression and presuppression activities would have an initial, short-term impact but would benefit the peregrine falcon over the long term by increasing its foraging area.

Conclusion:

There would be only minor impacts on the wilderness values of naturalness, solitude and primitive or unconfined recreation on less than five percent of the WSA. Fire suppression and prescribed burns would have a localized, minor, short-term impact on the area's wilderness values, but would enhance these values in the long term, improving peregrine falcon foraging areas and increasing visitor dispersion and the opportunities for solitude or unconfined recreation.

Impact on Sensitive Plant Species Habitat

Off-road vehicle use and full fire suppression with mechanized equipment would have a slight adverse impact on sensitive plant species that might exist in the area. However, heavy vegetation and rough terrain restrict ORV use to existing jeep trails and firebreaks, thereby lessening potential damage to these species and habitat. Field inventories will be conducted to further mitigate any potential impact and where these species and habitat are found to exist, mechanized fire suppression and other surface-disturbing activities will be restricted. Prescribed burns conducted to maintain the fire-dependent ecology would have no impact on the fire dependent species, as their existence depends on periodic fires.

Surface disturbance associated with the low-level exploration and development of the area's resources would be located in the southern portion of the WSA, below the area of suspected habitat, and would have no impact on the area's sensitive plant species habitat.

Conclusion:

Natural restrictions and those use restrictions imposed following the field inventory of the area's sensitive plant species and habitat would mitigate any adverse impacts. There would be no impact to these species/habitat as a result of mining exploration and development based on the occurrence of these species and likely location of any future mining activity.

Impact on Endangered Raptor Populations

Human disturbance resulting from the projected minimal increases in ORV and nonmotorized use (less than 80 visitor use days annually) would have no significant impact on the bald eagle and peregrine falcon foraging habitat. Most of the motorized use is associated with deer hunting which occurs primarily in the late summer and early fall when the eagles are not present. The majority of nonmotorized use is along the eastern edge of the WSA away from the more frequently used raptor foraging areas. The 150 acres of prescribed burns conducted every five years would have a minor impact initially, affecting only 2 percent of habitat within the WSA, but would benefit those species in the long term by increasing their foraging area.

Surface disturbance, noise, traffic, and construction associated with the low-level exploration and development of the area's resources would be located in the southern portion of the WSA away from the more frequently used foraging areas in the central and northeastern portions of the area. There would, therefore, be no impact on the bald eagles or peregrines.

Conclusion:

The bald eagles and peregrine falcons would be negligibly impacted by occasional ORV and nonmotorized use disturbance. Prescribed burns would have a minor, short-term impact, but could benefit the peregrine falcon in the long term by enlarging and improving foraging area. Overall, there would be no significant impact.

Adverse Impacts Which Cannot Be Avoided

The use of mechanized equipment in fire suppression to protect private or high-value property, would cause some minor, short-term, unavoidable adverse impact.

Relationship Between Local Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity

If the WSA is not designated wilderness, all present, short-term uses would continue. For the Eden Valley WSA there are many ongoing uses, including hunting, fishing, hiking, livestock grazing, wildlife management (deer, bald eagles, and peregrine falcons), and potentially, a very low level of mining exploration and development. Under the Proposed Action, future development options would remain open and long-term productivity would not likely be impacted. However, without wilderness designation, the possibility of activities that could reduce long-term productivity is greater than under wilderness designation.

Irreversible and Irretrievable Commitments of Resources

Activities such as mining, mineral leasing and material sales could create an irreversible commitment of the wilderness resource in part or all of a WSA, if it is not designated as wilderness. However, large-scale development is not anticipated now or in the foreseeable future, as there are no known deposits of mineral that would prove economical to mine. On the whole, however, no irreversible or irretrievable commitments of resources are anticipated.

ALL WILDERNESS ALTERNATIVE

Under this alternative, the entire 6,674 acres of the Eden Valley WSA would be recommended as suitable for wilderness designation.

The primary impacts under this alternative relate to wilderness values and sensitive plant species habitat.

Impact on Wilderness Values

Under the All Wilderness Alternative, all 6,674 acres of the Eden Valley WSA would be recommended suitable for wilderness designation and all values would be protected by legislative mandate. Wilderness values of naturalness, solitude, primitive or unconfined recreation, and special features of endangered species (bald eagle and peregrine falcon) would be retained.

- Naturalness

  There would be a low, positive effect on naturalness due primarily to the closure of the area to vehicles, even though current vehicular use of the area is low; i.e., 25 visitor use days annually. Also benefiting naturalness would be the exclusion of any mining exploration and development and the acquisition of the two 160-acre parcels in the southern portion of the area.

  As in the Proposed Action, prescribed burns on 150 acres of the WSA every five years would have a negligible impact on the perception of naturalness and the existing firebreaks would no longer be maintained but allowed to return to their natural state further enhancing the perception of naturalness throughout the area.

- Solitude

  Impacts on solitude would basically be the same as those described for naturalness. The elimination of ORV use and opportunities for mining exploration and development would have a low, positive effect on solitude, as would the acquisition of the two 160-acre inholdings. Prescribed burning would provide for greater dispersal of users throughout the area by eliminating dense, low-lying vegetation.

- Primitive or Unconfined Recreation

  The closure of the 5 miles of jeep trails (excluding those providing access to the two 160-acre inholdings in the southern portion of the area) and elimination of any mineral exploration/development would have a minor, positive impact on the area's opportunities for primitive or unconfined recreation. No new trails would be constructed, thereby restricting these opportunities, but only negligibly. No maintenance will be performed on the existing jeep trails and firebreaks, however, (other than by volunteers) which will diminish the use of these trails and firebreaks over time and further diminish primitive or unconfined recreation opportunities.

- Special Features

  The elimination of the noise and surface disturbance associated with ORV use and mining exploration and development would have a minor, positive impact on the bald eagles and peregrines which migrate through the area. Impacts to the area's steelhead and resident trout habitat would be the same as under the Proposed Action in that the terrain, dense vegetation, and restricted access along the Deep Hole Creek drainage precludes any ORV use.

  Fire suppression activities and the 150 acres of prescribed burns (to be conducted every five years) would have an initial, short-term impact, but would benefit these species in the long term by increasing their foraging area and reducing the level of fuel load and potential of more devastating wildfires.

Conclusion:

The net effect of the management actions would be the enhancement of the long-term protection of wilderness values, resulting from the closure of the area to ORV use and mineral exploration and development. In addition, long-term security from unanticipated adverse future actions would be provided. Impacts from prescribed burns would be the same as under the Proposed Action.

Impact on Sensitive Plant Species Habitat

Wilderness designation would have a minor, positive impact on the area's sensitive plant species by precluding ORV use, full fire suppression with mechanized equipment, and the surface disturbance associated with these activities. Increased nonmotorized use of the WSA would have no significant impact on these plants as the area's rough terrain and dense, low-lying vegetation effectively limit dispersion.

Conclusion:

The area's sensitive plant species would be slightly enhanced by the closure of the WSA to vehicular access. Otherwise impacts would essentially be the same as under the Proposed Action.

Impact on Endangered Raptor Populations

Under the All Wilderness Alternative, vehicular access would be restricted, eliminating 50 ORV visitor use days a year and mechanized fire-fighting equipment. Mining exploration and development would be precluded eliminating the 15 acres of surface disturbance, traffic, and noise associated with this activity. The net effect of these management actions would be a minor benefit to the bald eagle and peregrine falcon, reducing disturbance and opportunities for harassment and poaching. Increased nonmotorized use of the WSA (from 30 visitor use days to 50) would have no significant impact on these species.

Conclusion:

There would be a minor, beneficial impact on the area's endangered raptors from closure of the area to vehicles and mining activities. Land acquisition would also help, but the effect would be negligible. Increases in hiking and other nonmotorized uses would lead to some minor disturbance but not enough to override the benefits from closure of the area to vehicles.

THATCHER RIDGE WSA
(CA-050-212)

PROPOSED ACTION (No Wilderness/No Action)

Under the Proposed Action, the entire 17,187 acres of the Thatcher Ridge WSA would be recommended as unsuitable for wilderness designation. The 5-mile stretch of the Middle Fork of the Eel River would retain its designation as a "wild and scenic" river.

The primary impacts under this proposal relate to wilderness values and the anadromous fisheries.

Impact on Wilderness Values

None of the WSA would be recommended as suitable for wilderness designation and none of the wilderness values on 17,187 acres would receive the special legislative protection provided by wilderness designation. There is no recreation development planned and only a slight increase in ORV use is anticipated. Timber harvest would create some minor surface disturbances in the extreme northern and south-central portions of the WSA but these would be short term.

- Naturalness

Under this alternative, the presence of off-road vehicles and the 11 miles of existing jeep roads and firebreaks would impair the perception of naturalness on 400-500 acres of the WSA. Harvest of the area's 5 MMBF on 670 acres over two years and the surface and vegetative disturbance associated with this activity would further impair these values in the area's extreme northern and south-central portions. However, these impairments would be localized. Impacts to the Wild and Scenic River will be analyzed in a corridor management plan to be completed in 1987. In identifying and analyzing impacts, the effects timber harvest would have on the Eel River will be discussed. The W&SR corridor management plan will preclude timber harvest within the actual 1/2-mile-wide W&SR corridor. Timber harvest will occur outside this corridor, however, a harvest plan will be developed to minimize visual impacts within the viewshed of the river. Mitigation measures will be developed as part of the plan and may include such techniques as designing the shape of harvest units to duplicate natural openings, creating natural-appearing edges, scheduling harvesting over time, or minimizing roads and landings or skyline corridors.

The 400 acres of prescribed burns conducted every two years to perpetuate the fire-dependent species of the area would have minor, visual short term impact. Helispots would be utilized if helicopters are used in wildfire suppression or in prescribed burns. This may result in the hand removal of brush to facilitate the landing of helicopters but will have no impact on the area's naturalness.

Tree plantings on 200 acres of the WSA would have a minor positive impact on the area's naturalness, returning natural fire-denuded areas to a natural vegetation pattern.

- Solitude

Occasional off-road vehicle use and the noise associated with this activity would detract from the feeling of solitude on approximately five to six percent of the WSA, however, the low level of ORV use, both present (approximately 50 visitor use days annually) and projected (less than 75 visitor use days); natural rehabilitation of the 11 miles of jeep trails and firebreaks; steep terrain; and dense, low-lying vegetation would lessen these impacts.

The prescribed burns to be conducted every two years would have a short-term, minor impact, but would have a positive, long-term impact on solitude making more isolated spaces available in the thick, vegetative cover. Likewise, tree plantings in natural burn areas (rather than just allowing natural revegetation) would provide a screening effect.

- Primitive or Unconfined Recreation

The projected 75 visitor days of ORV use would diminish the opportunities for primitive or unconfined recreation for those visitors close to the 11 miles of jeep trails and firebreaks on approximately 400-500 acres. The area's dense, low-lying vegetation and the natural revegetation of existing jeep trails and firebreaks would lessen the level of impact.

The surface disturbance and noise associated with harvesting of the area's 5 MMBF of commercial timber would have a minor, but localized impact during the two-year harvest. Impact on the 5 miles of the Wild and Scenic River corridor would be negligible as logging would be restricted from within a quarter mile of either side of the river corridor. Tree plantings in natural-burn areas would provide interspersed open and vegetated areas.

- Special Features

The Wild and Scenic River resource would receive some minor negative impacts from ORV use and the use of mechanized equipment for full fire suppression due to the noise and surface disturbance associated with these activities. Timber harvest in the two northern locations could visually impact the Wild and Scenic River corridor, as well as possibly increase erosion and debris. These impacts would be mitigated by restricting timber harvest from within a quarter mile of either side of the river corridor until a corridor management plan is completed in 1987. The corridor management plan will identify and analyze the impacts of timber harvest on the Wild and Scenic River. Prescriptions described in the plan, in accordance with Bureau Policy, regulations, and Wild and Scenic legislation, may include a corridor of more or less than 1/2 mile, depending on topography, soil composition, and the extent of anticipated surface disturbance from any activity. Mitigation requirements and management prescriptions found in Sustained Yield Unit 13 and the East Mendocino Management Framework Plan will be carefully scrutinized and included in the plan as appropriate.

Tree plantings in these logged areas and burned areas would also reduce visual and erosion/debris impacts. The absence of recreation development would be a positive influence on the Wild and Scenic River resource. Threatened and endangered species (bald eagle and peregrine falcon) would receive minor, negative impact from ORV and nonmotorized use. Timber harvest areas would increase foraging opportunities as would prescribed burns.

Conclusion:

There would be minor impacts on the wilderness values of naturalness, solitude and primitive or unconfined recreation on approximately five to six percent of the WSA due to noise and surface disturbance of continued ORV use, full fire suppression with mechanized equipment, and timber harvesting. The area's special features--the Wild and Scenic River corridor, endangered raptors, and anadromous fish--would be only negligibly affected because ORV use is projected to remain low and timber harvests would be restricted in the quarter-mile buffer on either side of the river corridor.

Impact on Riparian Habitat

Continued ORV use, full fire suppression with mechanized equipment and timber harvesting on approximately 300 acres along the Wild and Scenic River corridor would have a minor impact on the area's riparian habitat primarily along 3 miles of the Middle Fork of the Eel. These impacts would be lessened, however, by restricting timber harvest from within a quarter mile of either side of the river corridor until a corridor management plan is completed in 1987, and by mitigation measures specified in SYU 13. Prescribed burns on 400 acres of the WSA every two years and on 400 acres in a one-time-only burn would have a positive impact in reducing fuel loads and the incidence of catastrophic wildfires. In addition, the lack of any recreational development (e.g., campsites or trails) and limited access would inhibit overuse by both motorized and nonmotorized users along the Wild and Scenic River corridor. Less than 275 visitor use days annually are projected for the entire WSA.

Conclusion:

There would be a minor impact on the riparian habitat along the Middle Fork of the Eel River as a result of continued ORV use and full fire suppression. Timber harvesting would also have a very minor impact. Other riparian habitat throughout the WSA would not be impacted.

Impact on Endangered Raptor Populations

Human disturbance resulting from the projected increase in ORV and nonmotorized use (from 250 visitor use days annually to less than 275 visitor use days) would cause some foraging disruption but would have a negligible impact on the bald eagles and peregrine falcons. Most of the 50 visitor use days of motorized use is associated with deer hunting which occurs primarily in the late summer and early fall when eagles are not present. The 400 acres of prescribed burns conducted every two years and the one-time-only 400-acre burn would have a minor impact initially, but would benefit these species in the long term by increasing their foraging area.

Surface disturbance, noise, and the traffic associated with the harvesting of 5 MMBF on 670 acres of the WSA would have a minor, short-term, disruptive effect, especially in the northern portion of the WSA which is immediately east of the raptor foraging area.

Conclusion:

The bald eagles and peregrine falcons would be minimally affected by occasional ORV and nonmotorized use and the noise associated with this use. Prescribed burns and timber harvesting would have a minor, short-term effect, but would benefit both species in the long term. Overall, there would be no net impact.

Impact on Anadromous Fish Spawning and Nursery Streams

Surface disturbance associated with the construction of 3 to 4 miles of mainline roads and spur roads and the harvest of 5 MMBF on 670 acres along 3 miles of the Middle Fork of the Eel River would have a minor impact on the anadromous fisheries due to a slight increase in erosion and sediment action. Impacts from these harvests, however, would be minimized by prohibiting logging from within a quarter mile of either side of the Middle Fork of the Eel River, management actions to protect Wild and Scenic Rivers (See Appendix B), and SYU 13 erosion and siltation control measures (Described in Appendix A). Erosion and sediment action resulting from the 400 acres of prescribed burns conducted every two years would be negligible due to the small size (15-20 acres) of these burns and the exclusion of prescribed burns within a quarter mile of either side of the River. Motorized and nonmotorized use levels are projected to remain low (less than 75 and 200 visitor use days respectively) and would have no significant adverse impact. The 200 acres of tree planting would have a small positive impact, providing increased vegetation and thereby lessening the chance of erosion and sediment action.

Conclusion:

There would be a minor, short-term, negative impact on the area's anadromous fish spawning and nursery streams due to slight increases in erosion and sediment levels. These levels would be minimized by required management actions to protect the Wild and Scenic River and SYU 13 erosion and siltation control measures.

Impact on Timber Production

Approximately 670 acres, 5 MMBF of Douglas-fir, would be cut. Other timber management practices such as tree planting on 200 acres of the WSA would occur.

Conclusion:

Commercial cutting on 670 acres would occur along with other management actions which would have a beneficial impact on the area's forest resources.

Adverse Impacts Which Cannot Be Avoided

The only unavoidable adverse impacts would be those associated with timber harvest and full-scale fire suppression when the use of mechanized equipment is necessary. These impacts would be greatly reduced through careful preplanning and immediate reclamation of disturbed areas. All other impacts, both negative and positive, would be minor in nature and would tend to balance out each other.

Relationship Between Local Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity

If the WSA is not designated wilderness, all present, short-term uses would continue. Off-road vehicle use and mining and mineral leasing activities could reduce the wilderness values over the long term. No mining or mineral leasing activities, however, are anticipated nor any other development.

Irreversible and Irretrievable Commitments of Resources

Activities such as mining, mineral leasing and material sales could create an irreversible commitment of the wilderness resource in part or all of a WSA, if not designated as wilderness. No mining, mineral leasing or material sales are anticipated; therefore, no irreversible or irretrievable commitment of resources is expected.

ALL WILDERNESS ALTERNATIVE

Under this alternative, the entire 17,187 acres of the Thatcher Ridge WSA would be recommended as suitable for wilderness designation.

The primary impacts under this alternative relate to wilderness values, riparian habitat management, wild and scenic river, anadromous fisheries and threatened and endangered species.

Impact on Wilderness Values

Under the All Wilderness Alternative, all 17,187 acres of the Thatcher Ridge WSA would be recommended suitable for wilderness designation and all values would be protected by legislative mandate. Wilderness values of naturalness, solitude, primitive or unconfined recreation and special features, such as the Wild and Scenic River corridor and the area's endangered raptors, would be retained.

- Naturalness

There would be a minor positive effect on naturalness due primarily to the closure of the area to vehicles, even though current vehicular use of the area is low (50 visitor use days). Restricting the harvest of 5 MMBF on 670 acres would also benefit naturalness in that naturalness would be retained.

As in the Proposed Action, prescribed burns on 400 acres of the WSA every two years and the one-time-only 400 acres would have a minor, short-term impact on the perception of naturalness but would benefit the area's naturalness in the long term. Existing firebreaks and jeep trails would no longer be maintained but allowed to return to their natural state, further enhancing the perception of naturalness throughout the area.

- Solitude

The elimination of both ORV use and the harvest of the area's 5 MMBF of timber on 670 acres would have a low, positive impact on solitude. Acquisition of the one 200-acre parcel would preclude any developments on the parcel that might affect the feeling of solitude in the WSA.

The prescribed burns to be conducted every two years would have a minor, short-term impact, but would have a positive, long-term impact on solitude making more isolated spaces available. However, the exclusion of tree plantings in natural burn areas that fail to revegetate naturally would have a minor, localized, negative impact eliminating more open, vegetative cover areas.

- Primitive or Unconfined Recreation

Eliminating the projected 75 visitor days of ORV use would enhance the opportunities for primitive or unconfined recreation for those visitors close to the 11 miles of jeep trails and firebreaks. These opportunities would be retained by precluding timber harvest on the designated commercial forest lands in the extreme northern and south-central portions of the WSA. The 400 acres of prescribed burns conducted every two years would provide for greater dispersal of users throughout the area by eliminating dense, low-lying vegetation.

- Special Features

The Wild and Scenic River corridor would receive a minor benefit from the closure of the area to ORV use and mechanized fire suppression and the noise and surface disturbance associated with these activities. Both have the potential for increasing erosion and sediment action. Eliminating both would protect the area's anadromous fish spawning and nursery streams. The area would also be closed to timber harvest which would preserve the scenic qualities along the Wild and Scenic River corridor where two of the timber harvest tracts are located. The possibility of erosion and increased sediment action associated with timber harvest activities would also be eliminated.

The bald eagles and peregrine falcons would also benefit from lack of ORV use and recreation development. The acquisition of the 200-acre private inholding would preclude any development that might adversely affect them. Prescribed burns on 400 acres of the WSA every two years would have a minor short-term impact but would benefit the peregrine falcon in the long term by increasing its foraging range.

A Programmatic Memorandum of Agreement between the Bureau, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation recognizes Bureau procedures and policy as adequate in protecting cultural resources, and the requirement for Section 106 consultation is categorically excluded.

Conclusion:

Overall, the inclusion of this area in the National Wilderness Preservation System would generally enhance wilderness values. The net benefit of the management actions on wilderness values would, however, be minor resulting from the closure of the area to ORV use and timber harvesting. In addition, long-term security from unanticipated adverse future actions would be provided.

Impact on Riparian Habitat

Wilderness designation would provide a minor, positive impact on the area's riparian habitat along the Middle Fork of the Eel and Thatcher Creek. Lack of ORV use, recreation development and timber harvesting on tracts along rivers and creeks would reduce the surface disturbance that might otherwise result from these activities under the Proposed Action. Prescribed burns on 400 acres of the WSA every two years and on a 400-acre one-time-only burn would have a positive impact by reducing fuel loads and the incidence of catastrophic wildfires. In addition, the lack of any recreational development (e.g., campsites or trails) and the area's limited access would inhibit overuse by both motorized and nonmotorized users along the Wild and Scenic River corridor.

Conclusion:

Small positive impacts from eliminating ORV use, recreational development, and timber harvesting coupled with increased long-term security from wilderness designation would enhance the area's riparian habitat.

Impact on Endangered Raptor Populations

Under the All Wilderness Alternative, vehicular access would be restricted, eliminating 50 visitor use days a year and mechanized firefighting equipment. Timber harvests would be precluded eliminating surface disturbance, traffic, and noise associated with this activity. The net effect of these management actions would be a minor benefit to the bald eagle and peregrine falcon, reducing disturbance and opportunities for harassment and poaching. Increased nonmotorized use of the WSA (from 200 to 250 visitor use days) would only negligibly impact these species because the area's rough and very steep terrain, and dense, low-lying vegetation restrict dispersion.

The 400 acres of prescribed burns conducted every two years would have a minor impact, initially, but would benefit these species in the long term by increasing their foraging areas.

Impact on Anadromous Fish Spawning and Nursery Streams

The closure of the area to ORVs and timber harvesting would have a minor positive impact on the anadromous fisheries resource by reducing the possibility of increased soil erosion and sedimentation from surface disturbance. Erosion from the 400 acres of prescribed burns conducted every two years and the 400-acre one-time-only burn would be negligible due to the small size (15-20 acres) of these burns. Tree planting on 200 acres of natural burn areas would be precluded leaving these areas more vulnerable to erosion and could increase stream siltation.

Conclusion:

Overall, wilderness designation would have a minor positive impact on the area's anadromous fisheries in that surface-disturbing activities leading to erosion and stream siltation would be less likely to occur.

Impact on Timber Production

Timber harvest opportunities on 670 acres of commercial timber land would be foregone. The current balance between supply, demand, and cost structure is such that it is highly unlikely that any other timber management activities would occur in the foreseeable future, even under the Proposed Action, except for the planting of 200 acres of commercial timber which would be prohibited under this alternative. Designation would preclude the harvest of 5 MMBF of timber.

Conclusion:

Wilderness designation would result in the loss of 5 MMBF of timber harvested and would preclude timber sales on 670 acres of available commercial timber. This impact is minimal. Approximately 200 acres of commercial timber planting would also be foregone.

Chapter 5

Consultation & Coordination

CHAPTER 5

CONSULTATION AND COORDINATION

OVERVIEW OF THE PROCESS

Public involvement has been a planned and integral part of the wilderness study process for the Eden Valley and Thatcher Ridge WSAs.

Formal and informal consultation began in 1978 with the initial inventory of public lands to determine their wilderness potential.

A Federal Register notice, a news release, and a scoping letter mailed to over 700 organizations, agencies, and individuals in February 1985 announced the initiation of the East Mendocino Management Framework Plan Amendment and Environmental Impact Statement, invited comments, and solicited suggestions on issues to be discussed and analyzed.

Oral and written comments received throughout the planning process were used in the development of the proposed actions and alternatives analyzed in the draft EIS.

The Draft EIS was completed in June 1986 and filed with the Environmental Protection Agency (EPA). The EPA and BLM notices of availability were published in the Federal Register on Friday June 20, 1986. A news release was also sent to local newspapers announcing the availability of the document for public review. The notice of availability also announced the formal public hearing, which was held in Ukiah, California, on July 23, 1986. The Draft EIS was mailed to the organizations and individuals listed on pages 5-4 and 5-5.

During the public comment period (June 20 to September 19, 1986) one formal hearing was conducted to solicit public advice and comments regarding the proposed action and alternatives.

Two hundred and one (201) written comments were received and nine individuals testified at the public hearing. The Redwood Chapter of the Sierra Club, Mendocino Public Lands Task Force, San Hedrin Chapter of the California Native Plant Society, Ecology Center of Southern California, California Wilderness Coalition, American Wilderness Alliance, Earth First!, Citizens Committee to Save Our Public Lands, Sinkyone Council, Environmental Protection Information Center (EPIC), and Planning and Conservation League were organizations providing comments supporting either all wilderness or more wilderness than considered in the All Wilderness Alternative. The California Association of Four-Wheel Drive Clubs supported nonwilderness designation.

COORDINATION WITH OTHER AGENCIES

During informal discussions in March 1986 with the U.S. Fish and Wildlife Service (FWS) it became apparent that on WSAs where endangered species are present, FWS believes that wilderness designation or nondesignation would not, in itself, result in adverse impacts. However, prior to implementing any management actions that may affect any potentially eligible threatened or endangered species, Section 7 consultation would be required.

The Environmental Protection Agency (EPA) categorized the DEIS EC-2, environmental concerns--insufficient information, because mitigation measures for potential impacts to water quality and beneficial uses were not fully addressed. EPA felt management practices could conflict with the Middle Fork of the Eel River Wild and Scenic River corridor management plan scheduled for completion in 1987. Additional comments are included in EPA's letter (No. 1) regarding logging, ORVs, and mining.

The Bureau of Reclamation stated that wilderness designation or nondesignation would have no effect on Bureau of Reclamation projects in the Mid-Pacific Region.

The National Park Service (NPS) questioned the potential impacts from logging and ORVs on the wild status of the Eel River and on cultural resources. Deep Hole Creek and Elk Creek in the Eden Valley WSA are spawning and nursery habitat for the anadromous fish population of the Middle Eel; NPS felt the DEIS did not address the potential impacts on this fishery. NPS pointed out that Deep Hole Creek and Elk Creek are also subject to the provisions of the National Wild and Scenic Rivers Act. NPS also felt that continued livestock operations and periodic controlled burns could create adverse impacts on cultural sites. However, in informal discussions with the State Historic Preservation Office it was determined that in WSAs where cultural resources are present, designation or nondesignation would not, in itself, result in adverse impacts. Prior to implementing management actions that may affect any potentially eligible cultural or historic properties, Section 106 consultation, as required by the National Historic Preservation Act, will be initiated.

The Mendocino County Department of Public Works felt the DEIS did not adequately evaluate the impact of a Federal land use decision on local roads providing access to the study areas. The Mendocino County Department of Planning and Building Services repeated Public Works' concern.

RESULTS FROM THE PUBLIC HEARING

The hearing officer was Richard Gibson, Public Affairs and Recreation Staff Officer for the Six Rivers National Forest in Eureka. The BLM was represented by John Lloyd, Arcata Area Manager; Earle Curran, Wilderness Program Coordinator; Van W. Manning, District Manager; and Barbara Taglio, Public Affairs, Ukiah District, California. About 20 people attended the hearing and 9 presented oral testimony. (A verbatim transcript is on file at the Ukiah District Office.)

The comments presented at the hearing did not distinguish between the two WSAs; as such, the comments were treated as being applicable to both the Eden Valley and the Thatcher Ridge wilderness study areas.

Nine people at the hearing testified with regard to the Eden Valley and Thatcher Ridge wilderness study areas. All supported wilderness designation--six favored the all wilderness proposal, and three proposed a 55,000-acre wilderness. The 55,000-acre proposal, which would include BLM and adjacent Forest Service public lands, was not analyzed in the draft EIS. Two of the nine questioned removal of the northern portion of the Eden Valley WSA from study status.

The following spoke on behalf of organizations supporting wilderness designation of the 6,674-acre Eden Valley WSA and the 17,187-acre Thatcher Ridge WSA: Don Morris, Earth First!; Ron Guenther, Redwood Chapter, Sierra Club; Darryl Cherney, Sinkyone Council; Jim Ferrara, Mendocino Public Lands Task Force; and Cecelia Gregori, Environmental Protection Information Center. Lynn Ryan spoke as an individual supporting the All Wilderness Alternatives for both WSAs.

Jim Eaton spoke on behalf of the California Wilderness Coalition in support of a 55,000-acre wilderness designation involving both BLM and U.S. Forest Service public lands. Tom Roboin, and Carol Vellutini spoke as individuals in favor of the 55,000-acre wilderness designation.

CONSISTENCY WITH OTHER PLANS

The Federal Land Policy and Management Act (FLPMA) requires that BLM plans be as consistent as possible with the plans of other agencies, while Federal laws, policies, and regulations are also considered.

The Mendocino County Board of Supervisors passed a resolution adopting the Bureau's Proposed Action; the Mendocino County Public Works Department expressed concern about the potential impacts of any Federal land use decisions on local roads that provide access to the study areas.

Finally, non-WSA lands that adjoin or are located within the BLM WSAs are either owned by private individuals or are administered by the State of California, Mendocino National Forest, or the BLM. The Bureau's Proposed Action for each WSA would be consistent with local land use plans as well as the objectives and plans of the State of California and U.S.D.A.-Forest Service (see p.1-10 regarding management of Forest Service lands contiguous to the WSAs).

DISTRIBUTION OF THE DRAFT EIS

The draft EIS was sent to the following agencies, organizations, and individuals.

FEDERAL AGENCIES

U.S. Environmental Protection Agency, San Francisco, CA, and Washington, D.C.
USDA, Forest Service, Mendocino National Forest, Willows, CA, Covelo, CA, Pacific Southwest Region, San Francisco, CA, and Washington, D.C.
USDA, Soil Conservation Service, Colusa, CA, and Washington, D.C.
USDI, National Park Service, San Francisco, CA, and Washington, D.C.
USDI, Fish and Wildlife Service, Portland, OR, and Washington, D.C.
USDI, Bureau of Reclamation, Sacramento, CA, and Washington, D.C.
USDI, Bureau of Indian Affairs, Sacramento, CA, and Washington, D.C.
Federal Energy Regulatory Commission, Washington, D.C.
Department of Transportation
Federal Aviation Administration
U.S. Air Force

CONGRESSIONAL REPRESENTATIVES

Douglas H. Bosco, U.S. House of Representatives, Santa Rosa, CA, and Washington, D.C.
Alan Cranston U.S. Senate, San Francisco, CA
Pete Wilson, U.S. Senate, San Francisco, CA

STATE AGENCIES

Cal Trans
California Department of Conservation, Sacramento, CA
California Department of Fish and Game, Yountville, CA
California Department of Forestry, Santa Rosa, CA
California Department of Water Resources, Red Bluff, CA
Humboldt State University, Arcata, CA
State Clearinghouse, Sacramento, CA
University of California, Hopland Field Station, Hopland, CA
State Historic Preservation Officer, Sacramento, CA

STATE LEGISLATURE

Dan Hauser, California State Assembly, Santa Rosa, CA
Barry Keene, California State Senate, Vallejo, CA

LOCAL AGENCIES

Covelo Indian Community
Mendocino County Board of Supervisors, Ukiah, CA
Mendocino County Department of Public Works, Ukiah, CA
Mendocino County Planning and Building Services, Ukiah, CA

ORGANIZATIONS

Ukiah Stone and Gem Club, Ukiah, CA
Biosystems Analysis GGNRA, Sausalito, CA
Cal Forest, Covelo, CA
California Association of 4WD Clubs, Inc., Sacramento, CA
California Native Plant Society, Sea Ranch, Potter Valley, Berkeley, San Francisco, and Ukiah, CA
California Wilderness Coalition, Davis, CA
International Woodworkers of America, Fort Bragg, CA
Los Altos Dirt Bikers, Palo Alto, CA
Mendocino County Cattlemen's Association, Redwood Valley, CA
Mendocino Sheriff's 4WD Patrol, Ukiah, CA
Redbud Audubon Society, Cobb, CA
Sierra Club, Fort Bragg, Santa Rosa, and Napa, CA
Sierra Institute, Santa Cruz, CA
The Environment Radio Show, Albion, CA
The Wilderness Society, San Francisco, CA
Western Timber Association, San Francisco, CA
California Natural Areas Coordinating Council
Louisiana-Pacific Corporation, Ukiah and Covelo, CA

INDIVIDUALS

Christopher Ahearn, Kentfield, CA
Ruth & Neal Carver, Redwood Valley, CA
George Early, Park Ridge, IL
James A. Ferrara, Covelo, CA
Lee A. Keeling, Tulsa, OK
Don Morris, Willits, CA
Rich Kent, Ukiah, CA
J. Sanchez, Tucson, AZ
John R. Swanson, Berkeley, CA
David and Ellen Drell, Willits, CA
Robert and Jane Harrah, Willits, CA
Ken Rich, Ukiah, CA
Phil Perry, Redding, CA
Pete Barnard, Eureka, CA
Jim Stokes, Redding CA
Joe Russ IV, Ferndale, CA
Anna Sparks, McKinleyville, CA
Elizabeth Miller, Redwood Valley, CA
Irv Brown, Ukiah, CA
Jean Jenny, Berkeley, CA
Steve Harris, Redding CA
Clair Hill, Redding, CA
Tom Clemens, Redding, CA

COMMENT LETTERS AND RESPONSES

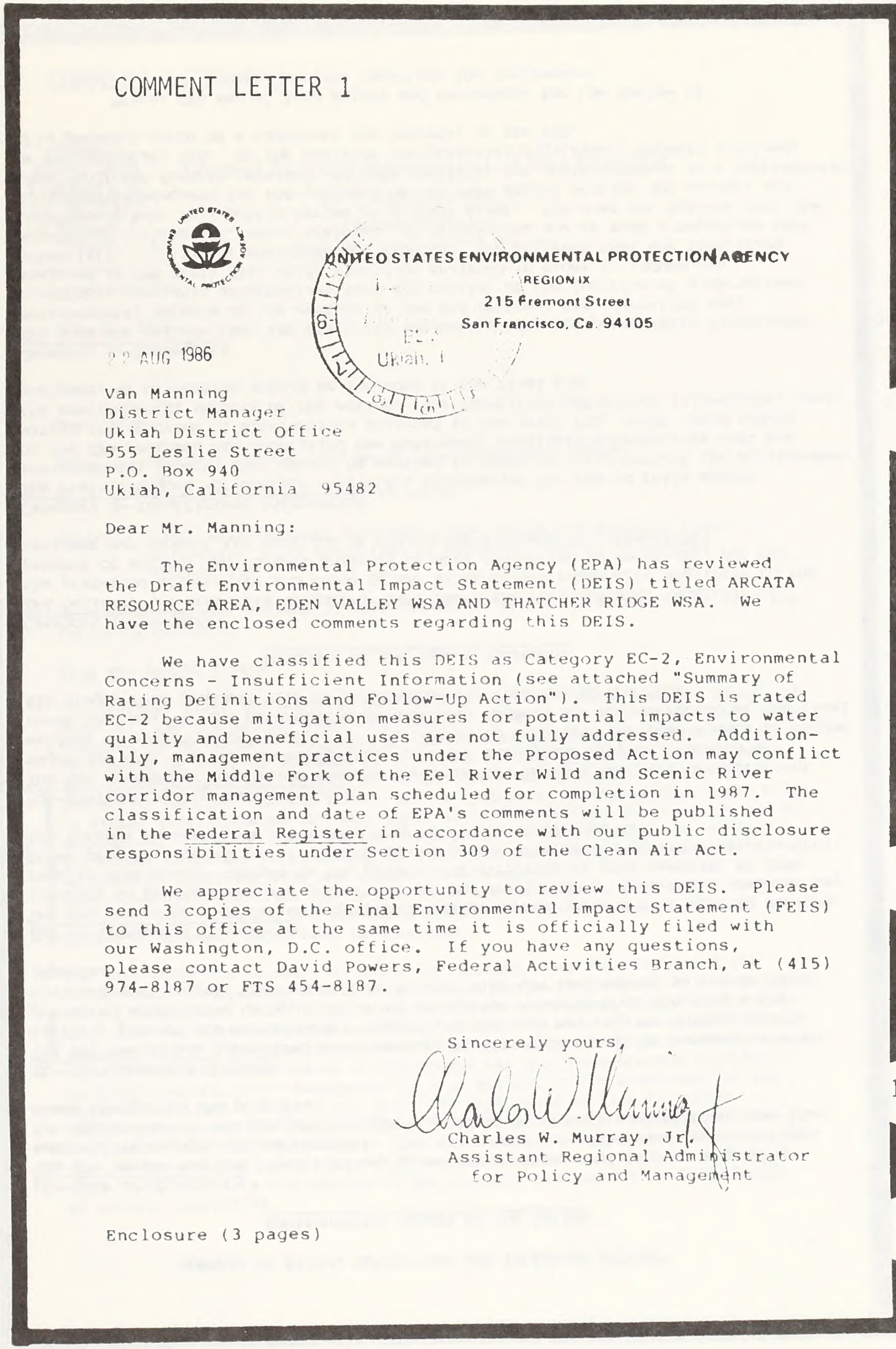
Comment letters on the Draft EIS were received from 201 sources. All of these letters were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the DEIS. Substantive comments which presented new data, questioned facts, and/or analyses, or commented on issues bearing directly on the DEIS or the environmental impacts of the proposed action were fully evaluated and given responses. Changes or additions to the DEIS have been incorporated into this final statement. Comments that require a response are identified by a number corresponding to the number of the letter and the number of the response. Comment letters are numbered as shown in Table 3. The responses start on page 5-36, immediately following the letters.

Table 3
Index to Comment Letters

Letter Number		Page
	Federal Agencies	
1.	Environmental Protection Agency	5-7
2.	Bureau of Mines	5-8
3.	National Park Service	5-9
4.	Bureau of Reclamation	5-10
5.	Bureau of Land Management	5-10
	Local Agencies	
6.	Mendocino County Department of Planning & Building Services	5-11
7.	Mendocino County Department of Public Works	5-11
8.	Mendocino County Board of Supervisors	5-12
	Organizations	
9.	Sierra Club	5-14
10.	California Wilderness Coalition	5-16
11.	American Wilderness Alliance	5-17
12.	California Native Plant Society	5-18
13.	California Association of 4WD Clubs, Inc.	5-19
14.	Mendocino Public Lands Task Force	5-19
15.	Citizens Committee to Save Our Public Lands	5-25
16.	The Planning and Conservation League	5-26
17.	Earth First!	5-26
	Individuals	
18.	Don Morris	5-27
19.	Jonathan M. Teague	5-29
20.	Glen Holstein	5-30
21.	William R. DeJage	5-31
22.	Cecelia Gregori	5-33
23.	Randolph J. Helms	5-35

Coordination

COMMENT LETTER 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

22 AUG 1986

Van Manning
District Manager
Ukiah District Office
555 Leslie Street
P.O. Box 940
Ukiah, California 95482

Dear Mr. Manning:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled ARCATA RESOURCE AREA, EDEN VALLEY WSA AND THATCHER RIDGE WSA. We have the enclosed comments regarding this DEIS.

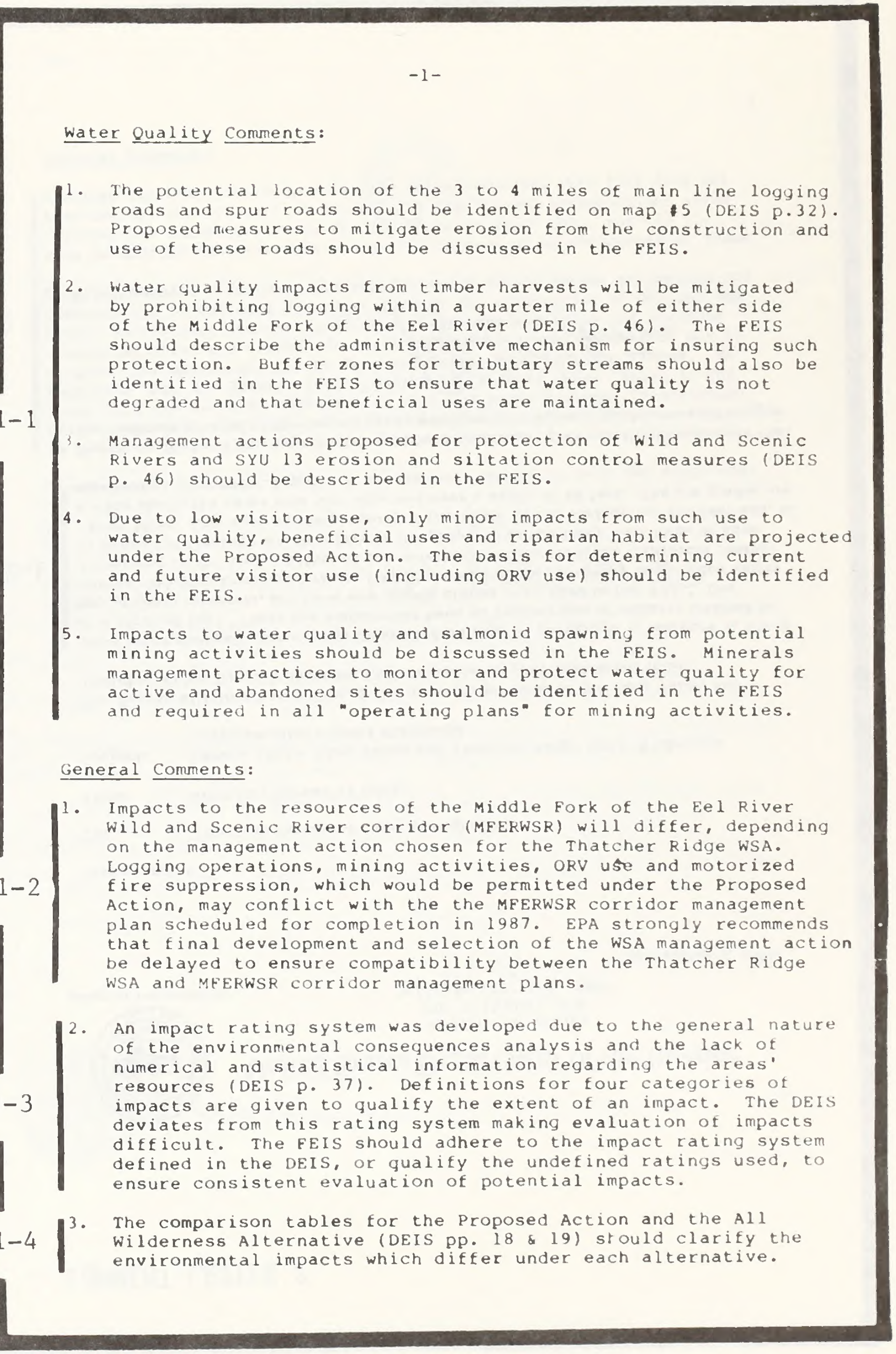
We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because mitigation measures for potential impacts to water quality and beneficial uses are not fully addressed. Additionally, management practices under the Proposed Action may conflict with the Middle Fork of the Eel River Wild and Scenic River corridor management plan scheduled for completion in 1987. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send 3 copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact David Powers, Federal Activities Branch, at (415) 974-8187 or FTS 454-8187.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (3 pages)



-1-

Water Quality Comments:

1-1

1. The potential location of the 3 to 4 miles of main line logging roads and spur roads should be identified on map #5 (DEIS p.32). Proposed measures to mitigate erosion from the construction and use of these roads should be discussed in the FEIS.

2. Water quality impacts from timber harvests will be mitigated by prohibiting logging within a quarter mile of either side of the Middle Fork of the Eel River (DEIS p. 46). The FEIS should describe the administrative mechanism for insuring such protection. Buffer zones for tributary streams should also be identified in the FEIS to ensure that water quality is not degraded and that beneficial uses are maintained.

3. Management actions proposed for protection of Wild and Scenic Rivers and SYU 13 erosion and siltation control measures (DEIS p. 46) should be described in the FEIS.

4. Due to low visitor use, only minor impacts from such use to water quality, beneficial uses and riparian habitat are projected under the Proposed Action. The basis for determining current and future visitor use (including ORV use) should be identified in the FEIS.

5. Impacts to water quality and salmonid spawning from potential mining activities should be discussed in the FEIS. Minerals management practices to monitor and protect water quality for active and abandoned sites should be identified in the FEIS and required in all "operating plans" for mining activities.

General Comments:

1-2

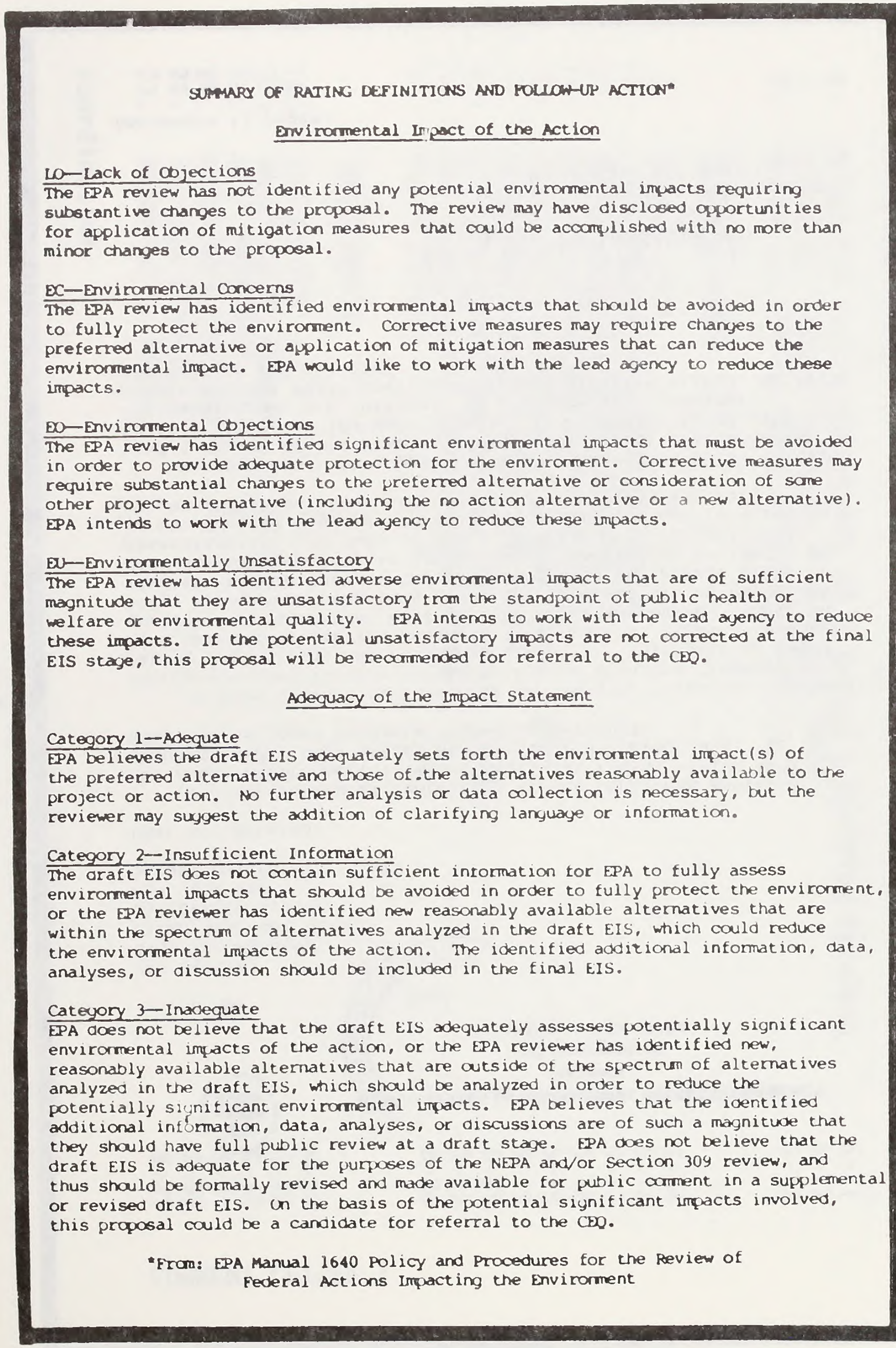
1. Impacts to the resources of the Middle Fork of the Eel River Wild and Scenic River corridor (MFERWSR) will differ, depending on the management action chosen for the Thatcher Ridge WSA. Logging operations, mining activities, ORV use and motorized fire suppression, which would be permitted under the Proposed Action, may conflict with the the MFERWSR corridor management plan scheduled for completion in 1987. EPA strongly recommends that final development and selection of the WSA management action be delayed to ensure compatibility between the Thatcher Ridge WSA and MFERWSR corridor management plans.

1-3

2. An impact rating system was developed due to the general nature of the environmental consequences analysis and the lack of numerical and statistical information regarding the areas' resources (DEIS p. 37). Definitions for four categories of impacts are given to qualify the extent of an impact. The DEIS deviates from this rating system making evaluation of impacts difficult. The FEIS should adhere to the impact rating system defined in the DEIS, or qualify the undefined ratings used, to ensure consistent evaluation of potential impacts.

1-4

3. The comparison tables for the Proposed Action and the All Wilderness Alternative (DEIS pp. 18 & 19) should clarify the environmental impacts which differ under each alternative.



SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

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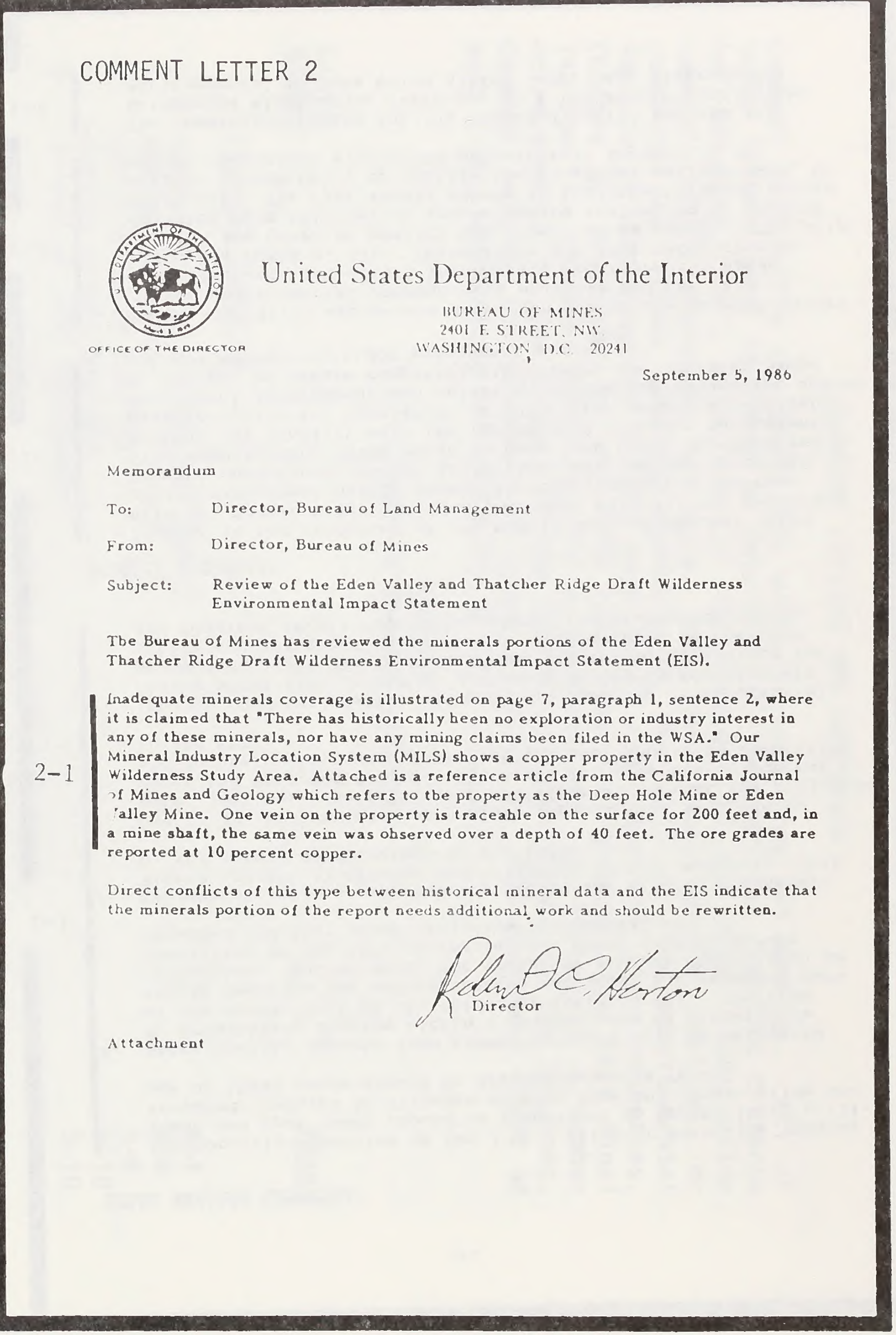
COMMENT LETTER 2



United States Department of the Interior
OFFICE OF THE DIRECTOR
BUREAU OF MINES
2401 E STREET, NW
WASHINGTON, D.C. 20241

September 5, 1986

Memorandum

To: Director, Bureau of Land Management

From: Director, Bureau of Mines

Subject: Review of the Eden Valley and Thatcher Ridge Draft Wilderness Environmental Impact Statement

The Bureau of Mines has reviewed the minerals portions of the Eden Valley and Thatcher Ridge Draft Wilderness Environmental Impact Statement (EIS).

2-1 Inadequate minerals coverage is illustrated on page 7, paragraph 1, sentence 2, where it is claimed that "There has historically been no exploration or industry interest in any of these minerals, nor have any mining claims been filed in the WSA." Our Mineral Industry Location System (MILS) shows a copper property in the Eden Valley Wilderness Study Area. Attached is a reference article from the California Journal of Mines and Geology which refers to the property as the Deep Hole Mine or Eden Valley Mine. One vein on the property is traceable on the surface for 200 feet and, in a mine shaft, the same vein was observed over a depth of 40 feet. The ore grades are reported at 10 percent copper.

Direct conflicts of this type between historical mineral data and the EIS indicate that the minerals portion of the report needs additional work and should be rewritten.

Robert C. Horton
Director

Attachment

COMMENT LETTER 3

United States Department of the Interior
NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:
L7619 (WR-RP)

July 25, 1986

Memorandum

To: District Manager, Bureau of Land Management, Ukiah

From: ACTING Regional Director, Western Region

Subject: Draft Environmental Statement, Eden Valley and Thatcher Ridge Wilderness Study Areas (WSA's) Mendocino County, California (DES-86-28)

In response to your request we have reviewed the subject document and have the following comments:

Wild and Scenic Rivers

The Thatcher Ridge WSA contains several miles of the Middle Fork Eel River, of which all but the northernmost mile is classified as a "wild" river. With the proposed non-wilderness designation, the statement indicates that the Middle Fork would be impacted somewhat by continued ORV use and some timber harvest. 3-1 This does not seem appropriate for "wild" river management. Although a protective corridor for the Middle Eel is indicated, extending one-fourth mile on either side, allowing ORV and timber harvest in such close proximity may be detrimental to "wild" river values--particularly those relating to solitude and scenic features. Please keep in mind that the quarter mile corridor is not an absolute limit for wild and scenic river management. Historically, it has been based on acquisition limits which are not an issue in this case. Larger buffer or control areas are sometimes needed to maintain river values and should be strongly considered in this case.

The Eden Ridge WSA contains at least two streams, Deep Hole Creek and Elk Creek, that are spawning and nursery habitat for the anadromous fish population of the Middle Eel. 3-2 The impact analysis of not designating this WSA as wilderness does not address the potential impacts on this fishery as is done in the analysis for the Thatcher Ridge WSA. Since anadromous fishery is one of the identified outstanding values of the Middle Eel and these streams contribute to that resource, their management is also subject to the provisions of the National Wild and Scenic Rivers Act. The same would be true for those smaller streams in the Thatcher Ridge WSA that contribute spawning and rearing habitat for anadromous fish. This does not mean that a protective corridor need be established along these streams, but it does mean that activities that could result in degradation of the spawning and rearing habitat should be closely controlled.

Cultural Resources

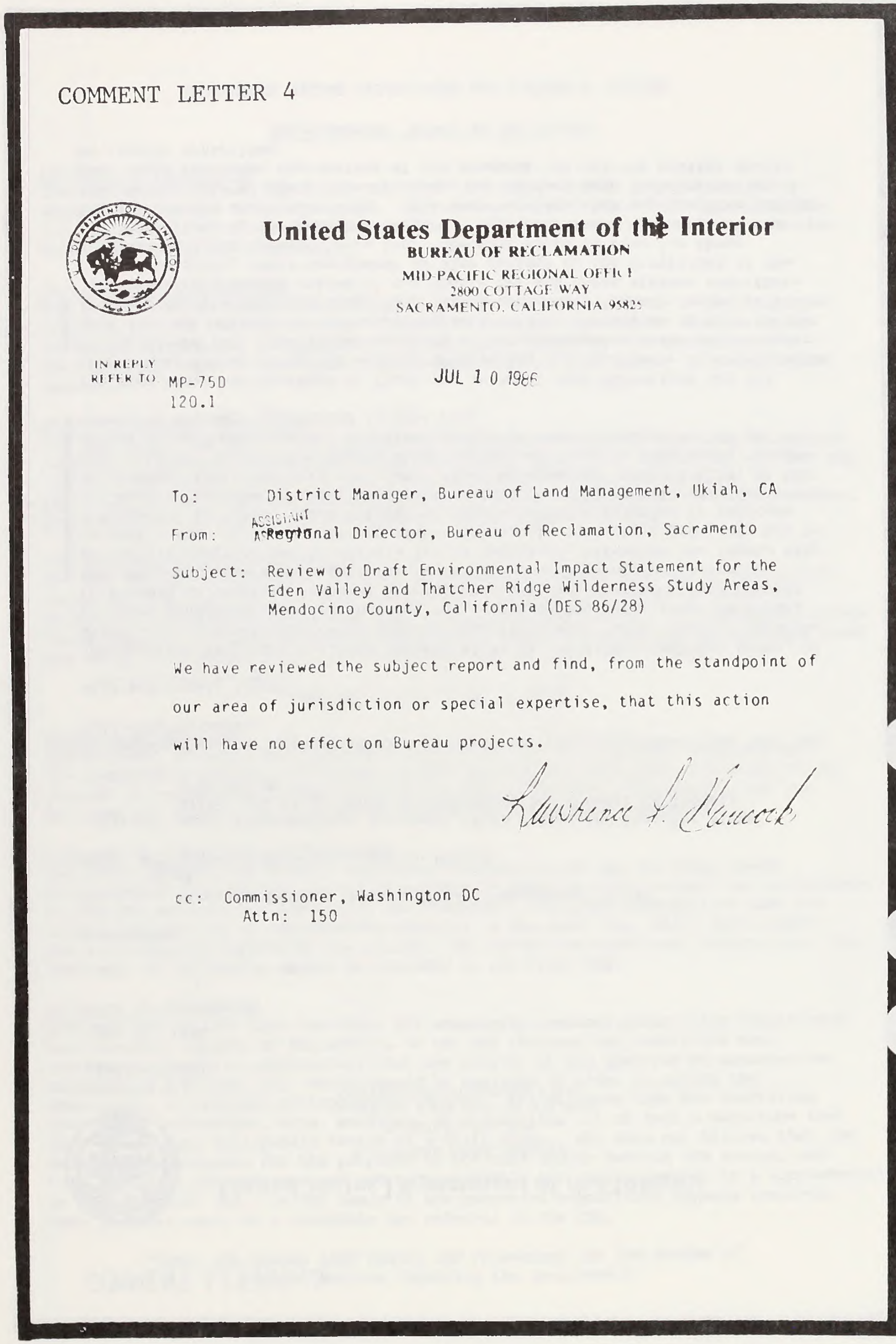
Although the WSAs are located in very rugged terrain, this fact does not preclude (1) the presence of potentially significant archeological sites (several are recorded already for the Thatcher Ridge WSA), nor (2) the need to address non-renewable cultural resources as an environmental issue.

3-3 Clearly, the All Wilderness Alternative would afford better protection and preservation of cultural resources through the elimination of ORV use and timber harvesting; however, continued livestock operations and periodic controlled burns can create adverse impacts to cultural sites that may be eligible for nomination to the National Register of Historic Places. We recommend that the Bureau of Land Management address these issues in the final DEIS and document consultation with the State Historic Preservation Office regarding proposed actions for the Eden Valley and Thatcher Ridge WSAs as required by Section 106 of the National Historic Preservation Act.

Thank you for the opportunity to review and comment on your WSA proposals.

W. Lowell White

cc:
WASO (762)
IAS



COMMENT LETTER 4

United States Department of the Interior
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CALIFORNIA 95825

IN REPLY REFER TO: MP-750
120.1

JUL 1 0 1986

To: District Manager, Bureau of Land Management, Ukiah, CA

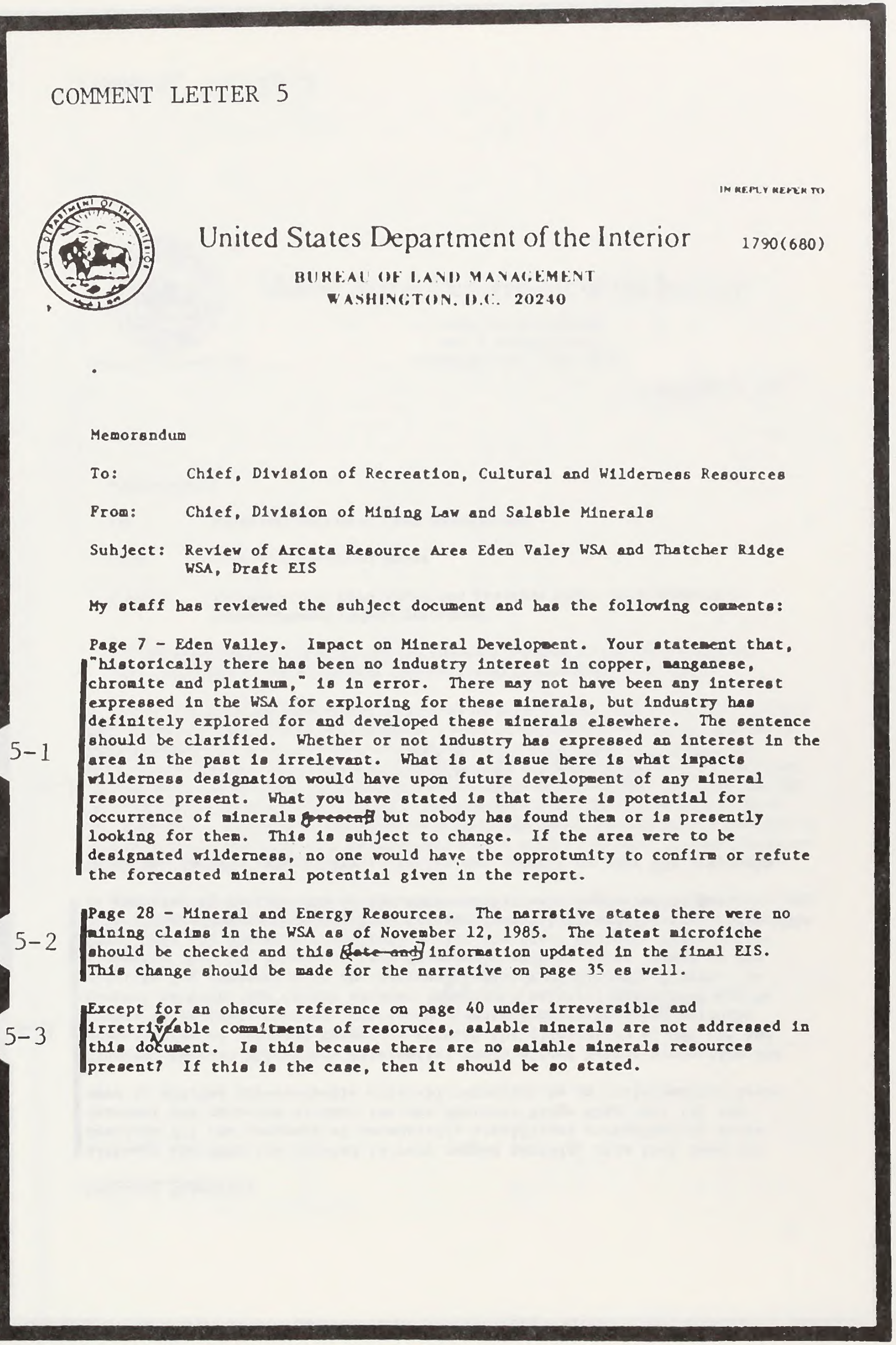
From: ASSISTANT Regional Director, Bureau of Reclamation, Sacramento

Subject: Review of Draft Environmental Impact Statement for the Eden Valley and Thatcher Ridge Wilderness Study Areas, Mendocino County, California (DES 86/28)

We have reviewed the subject report and find, from the standpoint of our area of jurisdiction or special expertise, that this action will have no effect on Bureau projects.

Lawrence F. Hancock

cc: Commissioner, Washington DC
Attn: 150



COMMENT LETTER 5

IN REPLY REFER TO 1790(680)

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

Memorandum

To: Chief, Division of Recreation, Cultural and Wilderness Resources

From: Chief, Division of Mining Law and Salable Minerals

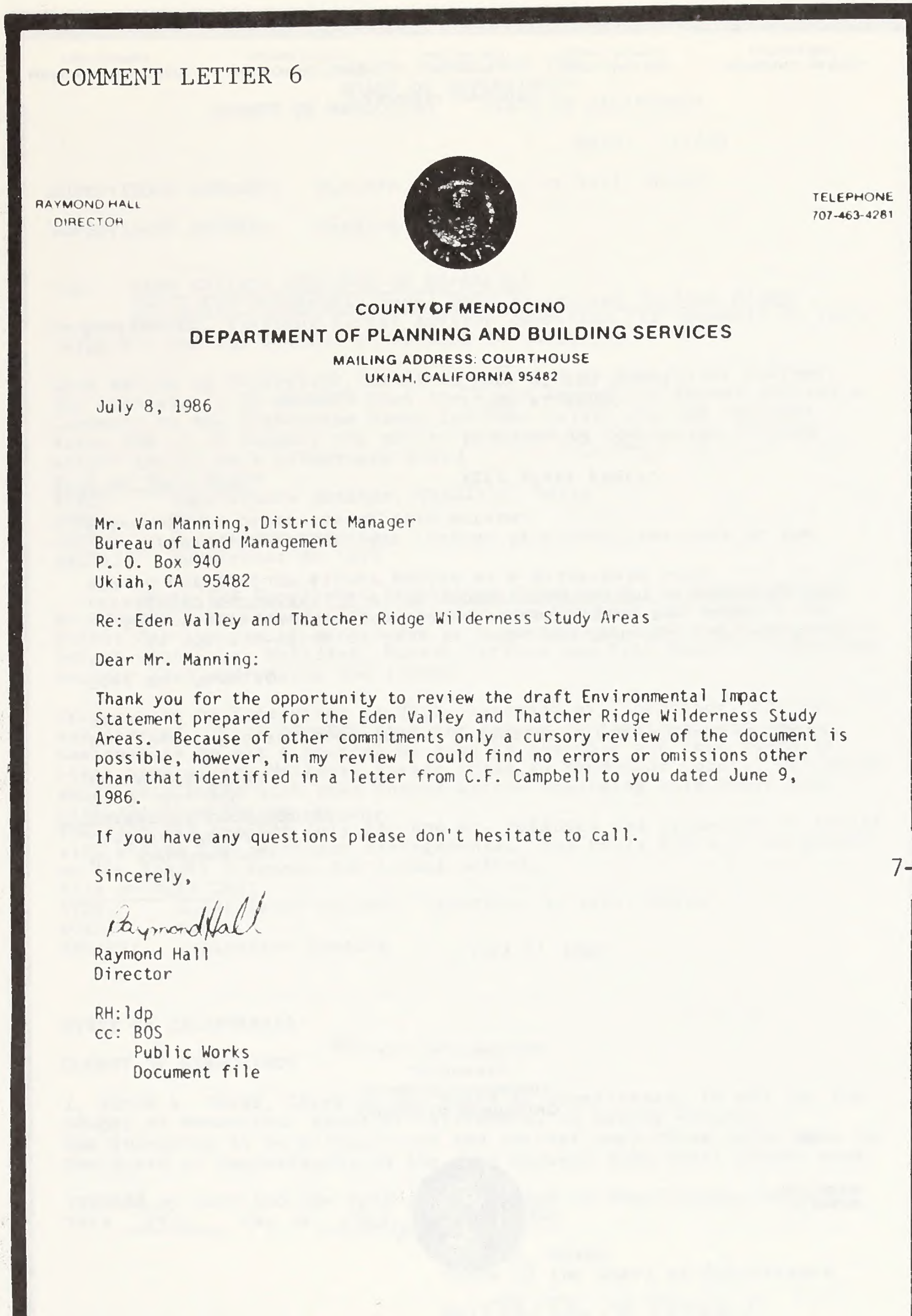
Subject: Review of Arcata Resource Area Eden Valey WSA and Thatcher Ridge WSA, Draft EIS

My staff has reviewed the subject document and has the following comments:

5-1 Page 7 - Eden Valley. Impact on Mineral Development. Your statement that, "historically there has been no industry interest in copper, manganese, chromite and platinum," is in error. There may not have been any interest expressed in the WSA for exploring for these minerals, but industry has definitely explored for and developed these minerals elsewhere. The sentence should be clarified. Whether or not industry has expressed an interest in the area in the past is irrelevant. What is at issue here is what impacts wilderness designation would have upon future development of any mineral resource present. What you have stated is that there is potential for occurrence of minerals ~~present~~ but nobody has found them or is presently looking for them. This is subject to change. If the area were to be designated wilderness, no one would have the opprotunity to confirm or refute the forecasted mineral potential given in the report.

5-2 Page 28 - Mineral and Energy Resources. The narrative states there were no mining claims in the WSA as of November 12, 1985. The latest microfiche should be checked and this ~~date and~~ information updated in the final EIS. This change should be made for the narrative on page 35 as well.

5-3 Except for an obscure reference on page 40 under irreversible and irretrievable commitments of resoruces, salable minerals are not addressed in this document. Is this because there are no salable minerals resources present? If this is the case, then it should be so stated.



COMMENT LETTER 6

RAYMOND HALL
DIRECTOR

TELEPHONE
707-463-4281

COUNTY OF MENDOCINO
DEPARTMENT OF PLANNING AND BUILDING SERVICES
MAILING ADDRESS: COURTHOUSE
UKIAH, CALIFORNIA 95482

July 8, 1986

Mr. Van Manning, District Manager
Bureau of Land Management
P. O. Box 940
Ukiah, CA 95482

Re: Eden Valley and Thatcher Ridge Wilderness Study Areas

Dear Mr. Manning:

Thank you for the opportunity to review the draft Environmental Impact Statement prepared for the Eden Valley and Thatcher Ridge Wilderness Study Areas. Because of other commitments only a cursory review of the document is possible, however, in my review I could find no errors or omissions other than that identified in a letter from C.F. Campbell to you dated June 9, 1986.

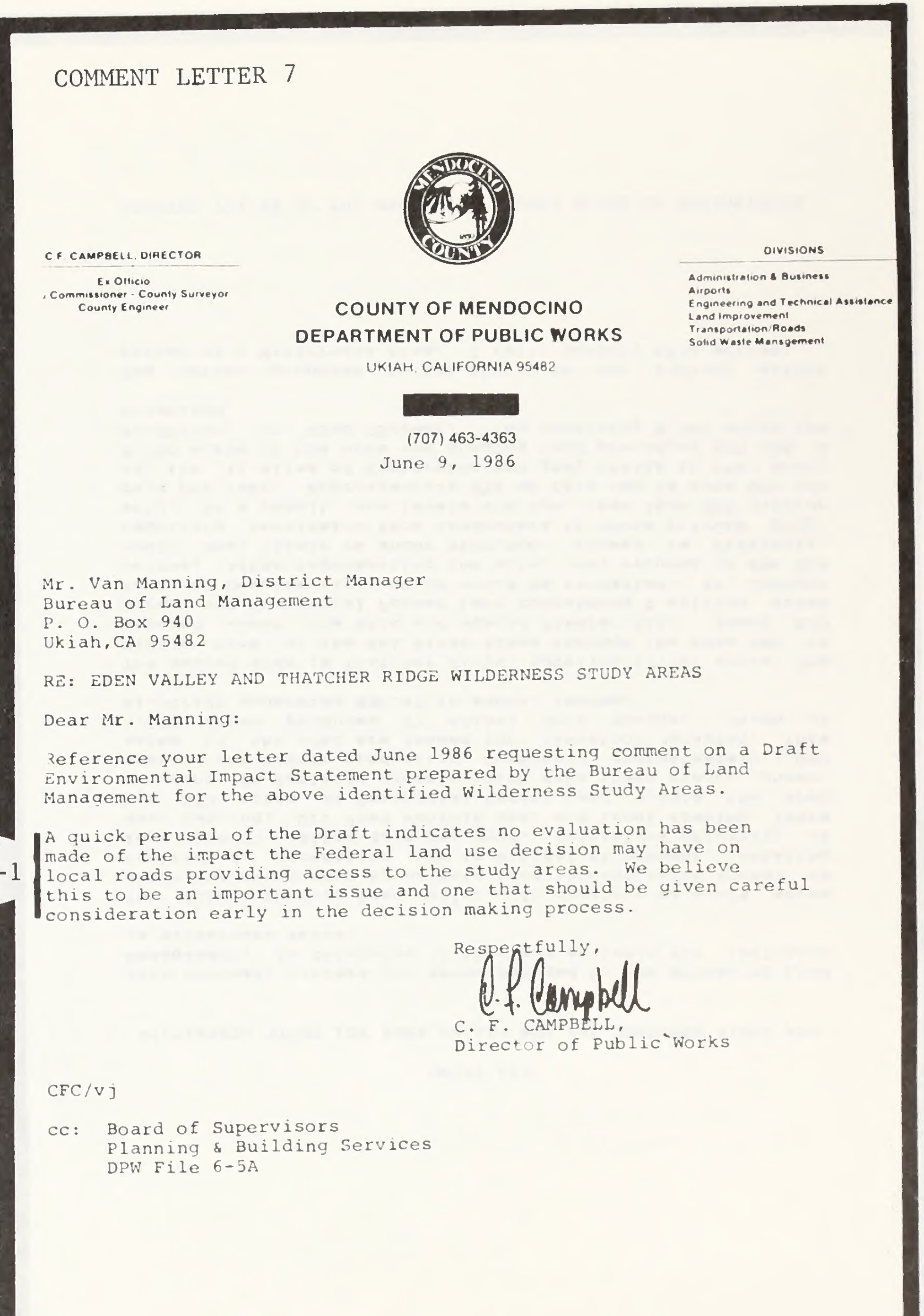
If you have any questions please don't hesitate to call.

Sincerely,

Raymond Hall

Raymond Hall
Director

RH:ldp
cc: BOS
Public Works
Document file



COMMENT LETTER 7

C F CAMPBELL, DIRECTOR
Ex Officio
Commissioner - County Surveyor
County Engineer

COUNTY OF MENDOCINO
DEPARTMENT OF PUBLIC WORKS
UKIAH, CALIFORNIA 95482

DIVISIONS
Administration & Business
Airports
Engineering and Technical Assistance
Land Improvement
Transportation/Roads
Solid Waste Management

[redacted]

(707) 463-4363

June 9, 1986

Mr. Van Manning, District Manager
Bureau of Land Management
P. O. Box 940
Ukiah, CA 95482

RE: EDEN VALLEY AND THATCHER RIDGE WILDERNESS STUDY AREAS

Dear Mr. Manning:

Reference your letter dated June 1986 requesting comment on a Draft Environmental Impact Statement prepared by the Bureau of Land Management for the above identified Wilderness Study Areas.

7-1 A quick perusal of the Draft indicates no evaluation has been made of the impact the Federal land use decision may have on local roads providing access to the study areas. We believe this to be an important issue and one that should be given careful consideration early in the decision making process.

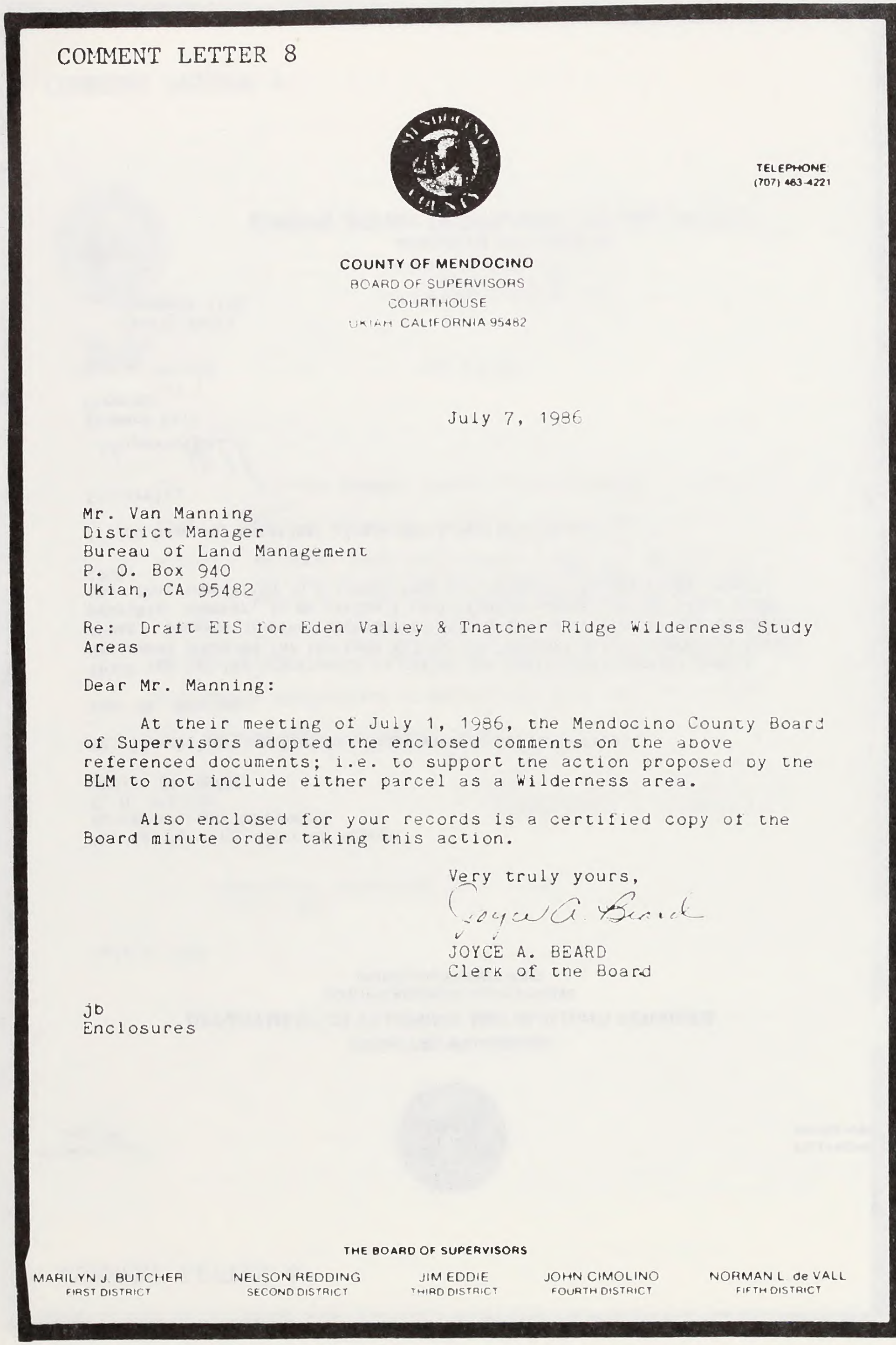
Respectfully,

C. F. Campbell

C. F. CAMPBELL,
Director of Public Works

CFC/vj

cc: Board of Supervisors
Planning & Building Services
DPW File 6-5A



COMMENT LETTER 8

COUNTY OF MENDOCINO
BOARD OF SUPERVISORS
COURTHOUSE
UKIAH CALIFORNIA 95482

TELEPHONE
(707) 463-4221

July 7, 1986

Mr. Van Manning
District Manager
Bureau of Land Management
P. O. Box 940
Ukian, CA 95482

Re: Draft EIS for Eden Valley & Thatcher Ridge Wilderness Study Areas

Dear Mr. Manning:

At their meeting of July 1, 1986, the Mendocino County Board of Supervisors adopted the enclosed comments on the above referenced documents; i.e. to support the action proposed by the BLM to not include either parcel as a Wilderness area.

Also enclosed for your records is a certified copy of the Board minute order taking this action.

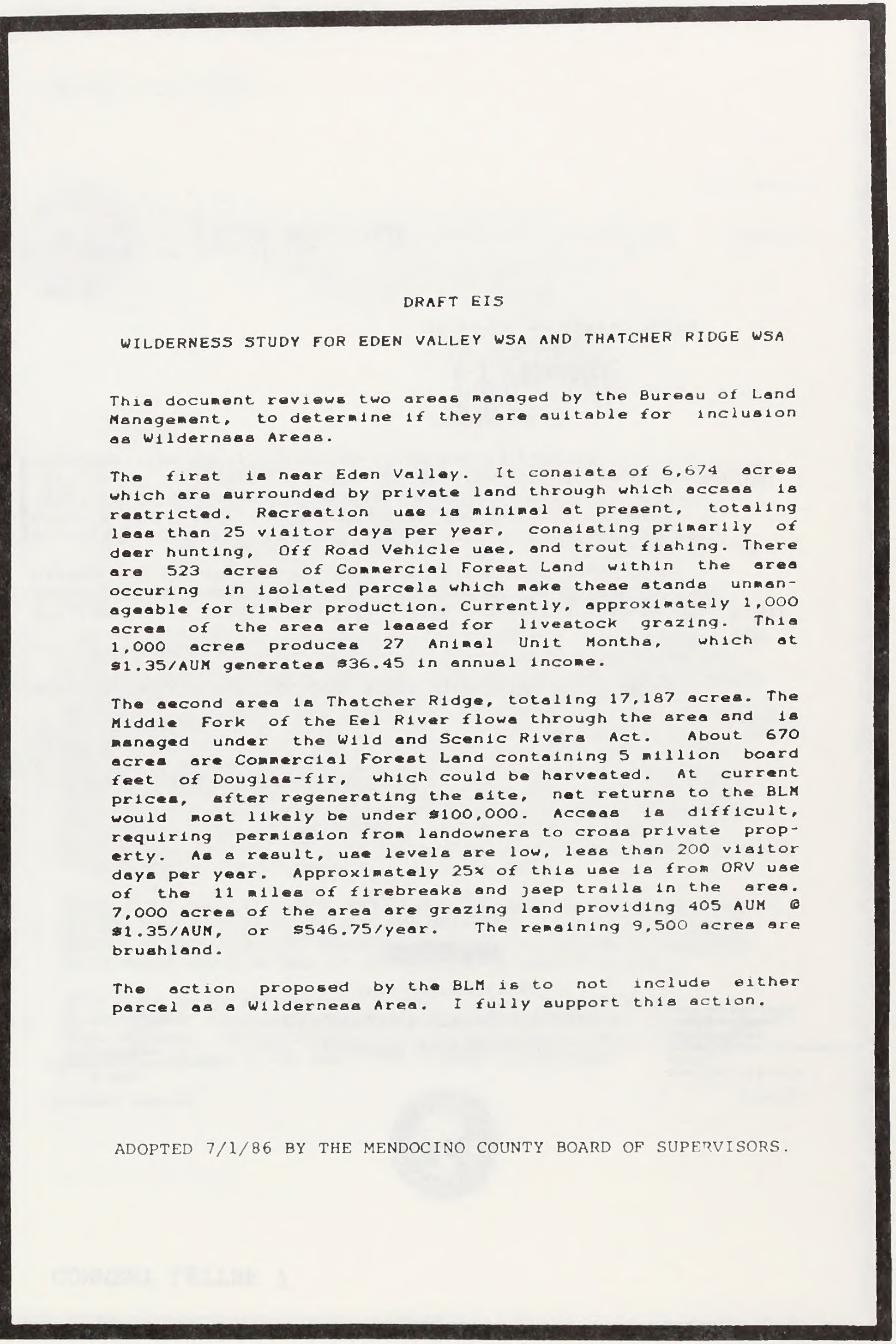
Very truly yours,

Joyce A. Beard

JOYCE A. BEARD
Clerk of the Board

jb
Enclosures

THE BOARD OF SUPERVISORS
MARILYN J. BUTCHER, FIRST DISTRICT
NELSON REDDING, SECOND DISTRICT
JIM EDDIE, THIRD DISTRICT
JOHN CIMOLINO, FOURTH DISTRICT
NORMAN L. de VALL, FIFTH DISTRICT



DRAFT EIS

WILDERNESS STUDY FOR EDEN VALLEY WSA AND THATCHER RIDGE WSA

This document reviews two areas managed by the Bureau of Land Management, to determine if they are suitable for inclusion as Wilderness Areas.

The first is near Eden Valley. It consists of 6,674 acres which are surrounded by private land through which access is restricted. Recreation use is minimal at present, totaling less than 25 visitor days per year, consisting primarily of deer hunting, Off Road Vehicle use, and trout fishing. There are 523 acres of Commercial Forest Land within the area occuring in isolated parcels which make these stands unmanageable for timber production. Currently, approximately 1,000 acres of the area are leased for livestock grazing. This 1,000 acres produces 27 Animal Unit Months, which at $1.35/AUM generates $36.45 in annual income.

The second area is Thatcher Ridge, totaling 17,187 acres. The Middle Fork of the Eel River flows through the area and is managed under the Wild and Scenic Rivers Act. About 670 acres are Commercial Forest Land containing 5 million board feet of Douglas-fir, which could be harvested. At current prices, after regenerating the site, net returns to the BLM would most likely be under $100,000. Access is difficult, requiring permission from landowners to cross private property. As a result, use levels are low, less than 200 visitor days per year. Approximately 25% of this use is from ORV use of the 11 miles of firebreaks and jeep trails in the area. 7,000 acres of the area are grazing land providing 405 AUM @ $1.35/AUM, or $546.75/year. The remaining 9,500 acres are brushland.

The action proposed by the BLM is to not include either parcel as a Wilderness Area. I fully support this action.

ADOPTED 7/1/86 BY THE MENDOCINO COUNTY BOARD OF SUPERVISORS.

MINUTE ORDER FROM THE
BOARD OF SUPERVISORS
COUNTY OF MENDOCINO   STATE OF CALIFORNIA

DATE: 7/1/86

SUPERVISORS PRESENT: Butcher, Cimolino, de Vall, Eddie

SUPERVISORS ABSENT: Redding

12b. FARM ADVISOR RESPONSE ON REFERRALS
Draft EIS Wilderness Area, Eden Valley and Thatner Ridge

Dennis Osborn, Visiting Forest Advisor submitted his comments on these referrals and was present to respond to questions.

Upon motion by Supervisor Cimolino, seconded by Supervisor Butcher, and carried, IT IS ORDERED that the Board adopts the Forest Advisor's Comments on the Wilderness Study for Eden Valley WSA and Thatcher Ridge WSA -- to support the action proposed by BLM to not include either parcel as a Wilderness area.

Vote on Roll Call:
AYES: Supervisors Butcher, Cimolino, Eddie
NOES: None
ABSENT: Supervisor Redding
ABSTAIN: Supervisor de Vall

Draft EIS Supplement Vegetation Management for Reforestation

Mr. Osborn's recommendation to accept the document and support the Forest Service use of herbicides as a management tool was discussed at length with Chuck McFadden, Forest Service and Pete Barnard, Louisiana Pacific also addressing the issue.

Upon motion by Supervisor de Vall, seconded by Supervisor Cimolino, and carried, IT IS ORDERED that the report is received, and the Chairman is to set a meeting as soon as possible for this Board to visit some of the National Forest lands in Mendocino County, following which this Board will take formal action regarding this Draft EIS.

Discussion on Motion
The tour was set for July 23, and Mr. McFadden was requested to assist with making the necessary arrangements. The Draft EIS will be placed on the August 5 agenda for formal action.

Vote on Roll Call
AYES: Supervisors Butcher, Cimolino, de Vall, Eddie
NOES: None
ABSENT: Supervisor Redding

STATE OF CALIFORNIA)
ss.
COUNTY OF MENDOCINO)

I, JOYCE A. BEARD, Clerk of the Board of Supervisors, in and for the County of Mendocino, State of California, do hereby certify the foregoing to be a full, true and correct copy of an order made by the Board of Supervisors, as the same appears upon their minute book.

WITNESS my hand and the seal of said Board of Supervisors, affixed this 7th day of July, 1986.

JOYCE A. BEARD
Clerk of the Board of Supervisors

By: ____________
DEPUTY

COMMENT LETTER 9

SIERRA CLUB
Redwood Chapter
North Group
POST OFFICE BOX 238
ARCATA, CALIFORNIA 95521

September 17, 1986

Van Manning
Bureau of Land Management
PO Box 940
Ukiah, California 95482

Dear Van Manning,

On behalf of the Executive Committee, I am submitting the following comments on the Eden Valley WSA and Thatcher Ridge WSA Draft Environmental Impact Statement.

The Eden Valley/Thatcher Ridge WSA area is difficult to find and gain access to. There is no public access from the southwest, which would be the most convenient way to get in. Private ranches effectively block access. Driving out the Edsel Ridge Road (when not closed by snow) through the Mendocino National Forest necessitated going through Round Valley first - a 6 hour trip from Willits to reach the closest WSA boundary.

To sum, the area is remote.

The Final Intensive Inventory of Public Lands Administered by BLM, Dec. 1979, describes Eden Valley as having retained its primeval character, been affected primarily by the forces of nature, and having imprint of man's works substantially unnoticable. Note that field examinations by BLM did not substantiate negative input from the public disclaining wilderness suitability for Eden Valley. Similarily, BLM field checks of Thatcher Ridge did not substantiate remarks and comments indicating extensive "imprints of man."

To sum, these areas are remote and wild.

9-1 The area has been misrepresented in terms of size on various fronts. In 1979 the northern portion of the Eden Valley study area was dropped from WSA status due to the presence of a 'road', thus decreasing by almost 50% the size of the WSA. Into this decapitated portion of BLM land extends one of the largest stands of Sargent cypress known. A pair of peregrine falcon is known to nest in the

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2 EV/TR DEIS

area. Through the northern edge of this decapitated portion runs the Wild and Scenic Middle Fork of the Eel River as it leaves the Thatcher Ridge WSA. The confluence of Elk Creek (a major tributary of the Eel) and the Middle Fork Eel is but ¼ mile east of the decapitated northern portion, with Thatcher Ridge WSA ¼ mile east of the confluence. In terms of watershed values, the deletion of the northern section Eden Valley from WSA status skews the true picture of valuable BLM holdings and WSA significance.

This misrepresentation in terms of size is most blatent when seen in conjunction with contiguous Forest Service roadless areas. When taken as a whole, the potential Elk Wilderness is at least 55,000 acres. No mention of this geographical position was made in the DEIS. In light of the BLM/Forest Service interchange efforts, acknowledgements of ongoing communication between BLM and Forest Service in terms of efficiency in cost savings, enhancement of public service and other management activities should habe been included in this DEIS. A precedent has been set for formal co-operative communications between the Mendocino National Forest and the Ukiah District BLM in the 11/84 Memorandun of Understanding, Management of the Yolla Bolly Middle Eel Wilderness. Acknowledgement of informal communication between BLM and Forest Service in managing these contiguous Elk roadless areas would have put size in true perspective.

To sum, the area is remote, wild and much larger than represented,

Understanding that grazing is an acceptable activity within designated Wilderness, the North Group wishes to again go on record in defense of the riparian habitat, clean water, grasses and soils that are negatively impacted by cattle grazing. Pages 15, 28 and 35 of the DEIS document the 8,250 acre Horse Pasture Ridge Grazing Allotment and 432 AUM level for the combined WSAs. Maintainence and construction range developments are mentioned on p. 15. Cows favor riparian zones, gravitating to palatable forage, shade and nearby water. (the overwhelming majority of vegetation is described in the DEIS as chaparral) Cattle hooves cause the desintegration and collapse of banks, causing erosion, siltation of the watercourse and reduction of fisheries habitat, in addition to riparian ecosystem destruction. Cattle feces in drinking water is a major cause of giardia, the bane of backpackers. The concept of "multiple use" is not as simple and congenial as it is made to sound.

Attempts by various Sierra Club groups to penetrate the Eden Valley WSA on foot proved no public access exists. None-the-less, a present level of 25 visitor use days of ORV use are currently occuring, with projections of 50 visitor use days expected (p.9). 9-2 How do these ORVs get in? Can we assume certain people are permitted access through private land? If so, the concept of "multiple use" has some serious problems...

Thatcher Ridge WSA presently has 50 visitor use days of ORV use with an expected increase to 75 visitor use days(p.38). We feel this projection is underestimated, based on the bloom of ORV sales in these northern counties, and the proposed road improvements due to timber harvests. This week BLM advertised a timber sale of 3264 MMBF on the northern boundary of the Thatcher Ridge WSA. My maps show no roads to the area at present. 5 MMBF of standing merchantable 9-3 timber is available within the WSA(p.19). "There are currently no roads capable of being used to haul timber from the area" (p.33). Forest Service land around Thatcher Butte is currently being logged, with accompanying road construction. These factors, and the 11 miles of firebreaks (used by ORVs) and jeeptrails now within the WSA point to a potential for greatly increased ORV activity. Riparian habitat and endangered raptor populations are at more risk than the DEIS leads one to believe. (p.45)

Wildlife is given many pages in the DEIS. (p.26 et al) The occurence of so many permanent water sources and riparian zones enhances the areas' overall desirability for wildlife. Intermingled vegetation types result in excellent wildlife habitat. On site observations substantiate these expectations, with"more birds and more evidence of mammals there than any other Wilderness" (quote from a hiker) With bald eagle, peregrine falcon, golden eagle, black shouldered kite and coopers hawk among those in the air, and ringtail cat, roadrunner, fisher, game animals and anadromous fish among those on the earth itself, the area is truly bountiful with wildlife.

Eden Valley/Thatcher ridge deserves Wilderness status. It is

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wild, remote, part of a larger roadless area, contains a federally designated Wild and Scenic River, and affords prime habitat for numerous species of wildlife. No significant conflicts were found by BLM to clash with wilderness suitability (p.8). For this reason, BLM has found it not suitable for wilderness recommendation, with current management effective to maintain the area's resources(p.8). (Be reminded that Cache Creek and Cedar Rough WSAs were found to be not suitable for wilderness recommendation because there were conflicts) 100% of the speakers at the public hearing July 23, 1986 in Ukiah encouraged wilderness status for the area. It is WILD!

Sincerely,
Lynn Ryan
Lynn Ryan, chair

COMMENT LETTER 10

California Wilderness Coalition

2655 Portage Bay Avenue, Suite 5 • Davis, California 95616 ~ (916) 758-0380

September 18, 1986

Van Manning, District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, California 95482

Dear Mr. Manning:

In addition to our oral comments made at the public hearing on July 23, 1986, we would like to offer the following comments on the Draft Environmental Impact Statement for Wilderness Recommendations for the Eden Valley and Thatcher Ridge Wilderness Study Areas (WSAs).

The California Wilderness Coalition is concerned that no agency has studied the wilderness values of the entire wilderness complex represented by the Eden Valley and Thatcher Ridge WSAs and the Elk Creek and Thatcher roadless areas in Mendocino National Forest. The Forest Service failed to consider the contiguous public lands when considering their areas in the Roadless Area Review and Evaluation [RARE II], and the Bureau of Land Management (BLM) is failing to consider these roadless areas in their current study.

The California Wilderness Coalition supports wilderness designation for both the Eden Valley and Thatcher Ridge WSAs and urges that the wilderness values of the entire 55,000-acre wilderness complex of BLM and Forest Service lands be studied as one unit.

In addition, we have the following specific comments on the Draft Environmental Impact Statement:

10-1 Page 3-4 — It is our understanding that members of the public responding to the scoping letter did indeed bring up the issue of the large wilderness complex, and that this issue is ignored in this wilderness study.

10-2 Page 33 — Since there are no roads capable of being used to haul timber from the Thatcher Ridge WSA, is the 670 acres of commercial forest land identified really available for harvest? Would the cost of access to this timber be greater than the value of the trees?

10-3 Page 38 — Since off-road vehicles would be banned from the Eden Valley WSA if it were designated as wilderness, they do not really have an impact on the naturalness of the area, the feeling of solitude, or opportunities of primitive and unconfined recreation.

Pages 43-44 — Since off-road vehicles would be banned from the Thatcher Ridge WSA if it were designated as wilderness, they do not really have an impact on the naturalness of the area, the feeling of solitude, or opportunities of primitive and unconfined recreation.

10-4 Page 44 — It is not clear whether the two northern locations for timber harvesting mentioned in regard to the Wild and Scenic River resource are within the WSA or not. It is mentioned that timber harvesting will be restricted from within a quarter mile of either side of the river corridor until a management plan is completed in 1987. Of course, if this timber is inside the WSA, it will not be harvested until Congress makes a final determination on the wilderness recommendations for the WSA.

Page 46 — Logging an area of timber does not necessarily result in a beneficial impact on the area's forest resources. An uncut forest is useful for research, watershed, and wildlife values which may be lost if the area is logged.

Page 46 — The use of mechanized equipment in timber harvesting is not the only unavoidable adverse impact of timber harvesting in the area. The loss of the forest's usefulness for research, watershed, and wildlife values also are unavoidable adverse impacts.

Thank you for this opportunity to comment on the Draft Environmental Impact Statement for Wilderness Recommendations for the Eden Valley and Thatcher Ridge Wilderness Study Areas (WSAs).

Sincerely,

Jim Eaton

Jim Eaton
Executive Director

COMMENT LETTER 11

American Wilderness Alliance
7600 East Arapahoe Road / Suite 114 / Englewood, Colorado 80112 / (303) 771-0380

RECEIVED

September 15. 1986

Mr. Van Manning, District Manager
Bureau of Land Management
P. O. Box 940
Ukiah, CA 95482

Dear Mr. Manning:

This is to comment for the official record in regard to the 6,674 acre Eden Valley and 17,187 acre Thatcher Ridge Wilderness Study Areas (WSAs).

The American Wilderness Alliance is a a western-based national non-profit organization whose members and staff are working to conserve the nation's decreasing public wildlands, wildlife habitat and free-flowing rivers.

We have members throughout the United States, including one of the largest groups in California, a number of whom are familiar with the WSAs and their wilderness characteristics.

11-1 We and our California members feel strongly that both WSAs and the national forest wildlands which join them should receive a wilderness designation. In total, they would comprise about 55,000 acres of undeveloped federal lands well qualified for wilderness status. By dividing them into three separate areas and not considering them together as one larger potential wilderness, the BLM and the U. S. Forest Service have arbitrarily downgraded their significance and value as wilderness.

The Middle Fork of the Eel River flows through the Thatcher Ridge WSA. A wilderness classification for the WSA would provide watershed protection for the river and help assure high quality water for fisheries, recreation and domestic purposes.

We further note that the endangered bald eagle and the peregrine falcon may be found in the two WSAs, and that the rare fisher has been sighted in the vicinity. Also, the WSAs provide habitat for deer, elk, river otter, mink, golden eagle and other wildlife. The unsullied watersheds of the WSAs supply important spawning and nursery areas for salmon and steelhead, as well as rainbow trout. Wilderness protection of their undisturbed habitats would benefit all of these species.

Working Together To
Conserve Wild America

A wilderness decision should not be based entirely on whether a WSA offers outstanding opportunities for wilderness recreation, although the two WSAs in question qualify on this criterion as well. Surely, watershed protection for the river, its fisheries and river otter in addition to habitat protection for other wildlife, including some endangered species, should also be considered. The presence of the valuable fisheries and wildlife most certainly enhance the wilderness quality of the WSAs.

Therefore, we strongly support the All Wilderness Alternative for these two WSAs and respectfully urge the BLM to revise its non-wilderness recommendations accordingly.

Please consider the entire 55,000 acre undeveloped area as one entity and work with the Forest Service to gain proper wilderness review for the national forest parcel.

Thank you for the opportunity to comment on this important matter.

Sincerely,

Clifton R. Merritt

Clifton R. Merritt
Executive Director

COMMENT LETTER 12

THE CALIFORNIA NATIVE PLANT SOCIETY
DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

September 11, 1986

Van Manning, District Manager
BUREAU OF LAND MANAGEMENT
P.O. Box 940
Ukiah, CA 95482

Dear Mr. Manning:

I would like to offer some comments concerning your D.E.I.S. for Eden Valley W.S.A. and Thatcher Ridge W.S.A. on behalf of the San Hedrin Chapter of the California Native Plant Society. We strongly disagree with your proposed action of No Wilderness for both of the Wilderness Study Areas. Eden Valley and Thatcher Ridge should both be recommended for wilderness. 12-1 We support the All Wilderness Alternative. With the Forest Service roadless land in between the two B.L.M. roadless areas, we have a 55,000 acre roadless area that should be considered as a whole, not just two isolated pieces of land. The combined areas represent important wilderness values that should be protected. One of the most important values which your agency consistently ignores or plays down is the ecological values. We are concerned about impacts on sensitive plant species, habitat for endangered raptor population, impacts on riparian habitat due to soil erosion, and ORV use in these areas.

12-2 As stated in your D.E.I.S., "Thatcher Ridge W.S.A. comprises a significant portion of the watershed of two important salmon and steelhead spawning and nursery streams." Can't you see that wilderness designation offers the best management tool for protecting the watershed and other ecological values of these areas. ORV use of these areas should not be allowed. It degrades the resource and causes management problems that your agency cannot handle due to budget restraints.

The All Wilderness Alternative seems the most rational, ecologically sound, and economically your best alternative. Why you refuse to recognize the many values of wilderness is beyond us. Remember wilderness is also an important part of a good multiple land use management plan. Your rationale of very minor benefits due to wilderness designation is misleading. Intact ecosystems managed in their natural state offer far more benefits in the long term to maintaining the integrity of the ecosystem. These two roadless areas have minor human imprints on the landscape. They have retained their primeval character and deserve to be protected from future multiple abuse by being designated as wilderness.

We urge you to reconsider your No Wilderness recommendation and recognize the importance of protecting Eden Valley and Thatcher Ridge W.S.A. Wise decisions today represent a brighter, more productive future tomorrow. Please support the All Wilderness Alternative. Thank you for your time.

Sincerely,

Steve Zachary

Steve Zachary
Conservation Chairman

San Hedrin Chapter C.N.P.S.
739 N. Oak Street
Ukiah, CA 95482

SZ:cj

COMMENT LETTER 13

CALIFORNIA ASSOCIATION · 4WD CLUBS INC

5831 Rosebud Lane, Unit M-1
Sacramento, CA 95841
(916) 338-4540

September 25, 1986

BLM, Ukiah District Office
Mr. Van Manning, District Manager
P.O. Box 940
Ukiah, CA 95482

Dear Mr. Manning,

The D.E.I.S. for the Eden Valley and Thatcher Ridge Wilderness study areas has been reviewed and we concur with your recommendation to not designate either area as wilderness. This decision corresponds to our previous recommendations and study of the two areas. Thank you for the opportunity to comment on this subject.

Sincerely,

Ed Dunkley
ED DUNKLEY
FIELD REPRESENTATIVE

COMMENT LETTER 14

9-17-86
Box 522
Covelo, CA 95428

Van Manning
Ukiah District Office, BLM
P.O. Box 940
Ukiah, CA 95482

RE: Wilderness Recommendations- Eden Valley WSA and Thatcher Ridge WSA- Draft Environmental Impact Statement

Dear Mr. Manning:

Although this DEIS does identify a number of outstanding wilderness values in the Eden and Thatcher WSAs, its arbitrarily selective and incomplete data and analysis are used to create a platform for opposition to wilderness recommendations. Adequate assessment of impacts of the proposed recommendations would need to be based on all of the sufficient reliable information available. The absence of such information is evident both in the DEIS's exclusion of major known issues and in its conclusory statements concerning unknown or partially known data and their interrelationships.

That the two WSAs are contiguous to two Forest Service Roadless Areas, "Elk Creek" and "Thatcher," and that all four area together comprise a single roadless area of some 55,000 acres are not even mentioned anywhere in the DEIS. This major omission is unquestionably intentional (I identified this issue in the scoping for this review in April of 1985), and it undermines the adequacy of the document as well as the credibility of the agency which produced it. Likewise is the Deep Hole Creek Hydroelectric Project completely unmentioned in the DEIS, even though the project would require a dam, a diversion penstock, a powerhouse, a new road, and powerlines within the Eden Valley WSA. Deep Hole Creek is described in the DEIS as "an important anadromous fish and native trout spawning and nursery stream" (p. 6), yet no mention is made in the "Environmental Consequences" (Chapter 4, pp. 37-43) of the possible destruction of the fishery which the hydro project might pose. 14-1

The DEIS also glosses-over the followiwng issues, each of which needs further consideration:

14-2 1) The effects of the proposed 3-4 miles of new logging roads and timber harvest on critical bald eagle roosting habitat, on the fisheries and other stream values, and on spotted owl habitat/populations.

14-3 2) The effects of current grazing use on wilderness values, including wildlife, fisheries and water quality. With regard to wildlife, "Problem areas include: (1) grazing in wet areas, including seeps, springs, and perennial creek bottoms, and (2) allocation of forage to wildlife. Although the wet areas are limited on BLM grazing lands, they are important for a variety of wildlife. The problem of forage allocation is particularly noticeable in northeastern Mendocino County where the CDFG has identified winter deer range (CDFG, ASBI Map 23). The winter deer range occurs primarily below 3500 feet elevation along major drainages of the area, and much of the range is in private ownership. Approximately 3,000 acres of the winter deer range occur on public domain under BLM grazing lease (GL 5500)." This information is also excluded from the Eden-Thatcher DEIS, even though GL 5500 includes 7,000 acres of the Thatcher WSA. The information must be noticed in the Yokayo Grazing Draft Environmental Impact Statement, 1983, pp. 3-4 and 3-8. Even more critical to consideration of current grazing use effects is the manageability determination found in Appendix 1 (p. A1-1) of the same grazing document: it lists as suitable only 830 of the 7100 acres in the allotment.

14-4 3) The relationship between ongoing increases of erosion gullies and livestock grazing needs further investigation.
4) The possible presence of rare plants needs adequate in the field research.
5) Reconsideration of the northern portion of the Eden Valley WSA for wilderness designation, to include cypress stands.
6) Overall impacts to water quality (soil erosion, sedimentation, loss of riparian vegetation, bacterial contamination, etc.) should be addressed for the proposed actions and each alternative.

7) "Vehicular use for recreational purposes is the primary influence on increased sedimentation levels in the WSA" (p. 6) needs further consideration. The whole issue of private-only access of recreational vehicles to these public Wilderness Study Areas needs further investigation.

8) "Because of the general nature of this analysis and the lack of nemerical and statistical information regarding the areas' resources, impacts in this chapter ("Environmental Consequences") are often expressed in relative terms."(p. 37) Therefore, because the DEIS does not quantify impacts (i.e., erosion and sedimentation rates, changes in vegetative cover, loss or gain of riparian habitat, etc.), it is difficult to assess the degree of impact and compare the alternatives (including the proposed no-action).

9) Further consideration of proposed non-designation on the long-term conditions of the peregrine falcon habitat.

10) Inasmuch as the comparative summaries (pp. 18-19) reflect all of the above omissions and oversights, they misrepresnet the real tradeoffs involved in considering the alternatives. Inevitably, in reviewing this document, one must come to wonder what else has been excluded from consideration.

A potentially significant issue is related to cultural resources: "...the flatter areas (in the Thatcher WSA) with hopland-Maymen-Etsel soils complex may contain some archaeological sites with deposits perhaps as deep as 50 centimeters. A sample field inventory would be necessary to test these assumptions and to balance the survey coverage within (King, 1966) and near (Treganza, Smith, and Weymouth, 1950) the study area." Such inventory would contribute significant substance to the DEIS.

COMPLETELY OUTRAGEOUS is the following contention concerning the "visual quality" of both WSAs: "Overall, the area is monotonous."(p. 23) Not only is the absurdity of this statement evident to everyone who has had the good fortune to visit the area, as I have, but even just taking a couple of the descriptions of the topography and vegetative scrambling, as found in the DEIS, and comparing them to the monotonous image incongruously set forth in the above quotation, reveals the fallacy: "... the presence of abundant water, relativlely flat expanses, and a heterogenous interplay of vegetation communities"(p. 22); and "the vegetation inhabiting the ultramafic substrate is unique and somewhat uncommon...On the soils that are Franciscan in nature (i.e., sedimentary) exists a mosaic dominated by California mixed chaparral but including a substantial blue/northern oak woodland component, cismontane introduced grassland and a mesic phase of the mixed evergreen forest."(pp. 23-4,emphasis added) Heterogenous and mosaic are appropriate where monotonous is used. Furthermore, the above quotes do no includ the riparian habitats of the designated Wild and Scenic Eel River, nor do they take into consideration the visual quality of experiencing the wide variety of wildlife species.

II. Inadequate Data

In addition to the above-mentioned omissions and incongruities, sheer lack of original first-hand technical reports and findings is another reason for the document's inadequacies. Sources, both written and oral, are scattered between the Ukiah and Arcata offices and their numerous specialists. At the very least, an administrative record should already have been assembled in preparation for the release of the DEIS, so that public review of key data summarized therein would be possible. As it was, when I requested such data in person at the Ukiah Office on July 23, 1986, I was unable to verify in any documented form any of the following unreferenced statements contained in the DEIS:

"

--Vehicular use for recreational purposes is the primary influence on increased sedimentation levels in the WSA. (p,6)

--Projections indicate that current vehicular use levels of less than 50 visitor days per year will not increase significantly if the area is not designated wilderness. (6)

--The reasons for dropping impact on wildlife populations and habitat in the Thatcher Ridge WSA are the same as those given for Eden Valley WSA on p. 6. (7)

--Current management has proven effective in maintaining the area's resources. (8)

--In the unlikely event that development did occur, it is assumed it would be of a very low level, based on similar developments in areas within 5 miles of the WSA. An estimated 15

acres of surface disturbance...2 miles of primitive road... tailing piles, adits, loading areas, and buildings in the vicinity of the claims. (10)

--Projections indicate that recreational use would increase slightly, but would remain at levels below 75 visitor use days annually for the foreseeable future. (13)

--Recreational use for these activities would remain constant at levels below 200 visitor use days annually. (13-14)

--Projections beyond planning estimates indicate that livestock use would be maintained at the existing level of 405 animal unit months... (14-15)

--The WSA is also classified as prospectively valuable for geothermal resources... (15)

--The potential for the occurrence is low to moderate. (15)

--Bald eagles and peregrine falcons will be negligibly impacted by occasional ORV and nonmotorized disturbance. Prescribed burns will have a very minor short-term impact but will enlarge foraging areas thereby enhancing the bald eagle and peregrine falcon habitat. (18)

--Timber harvest would have a very minor, short-term impact but would benefit these species in the long term by increasing their foraging area. (19)

-- Overall, the area is monotonous. (23)

--The visual resource class is VRM Class 4. (23)

--The scenic quality is rated as Clsss B based on the wild character of the river. (23)

--The WSAs comprise a portion of a feeding territory used by a pair of peregrine falcons. (26)

--If not grazed heavily, meadows in the vicinity of Ellis Creek and Bennett Valley are considered important fawning areas. (26)

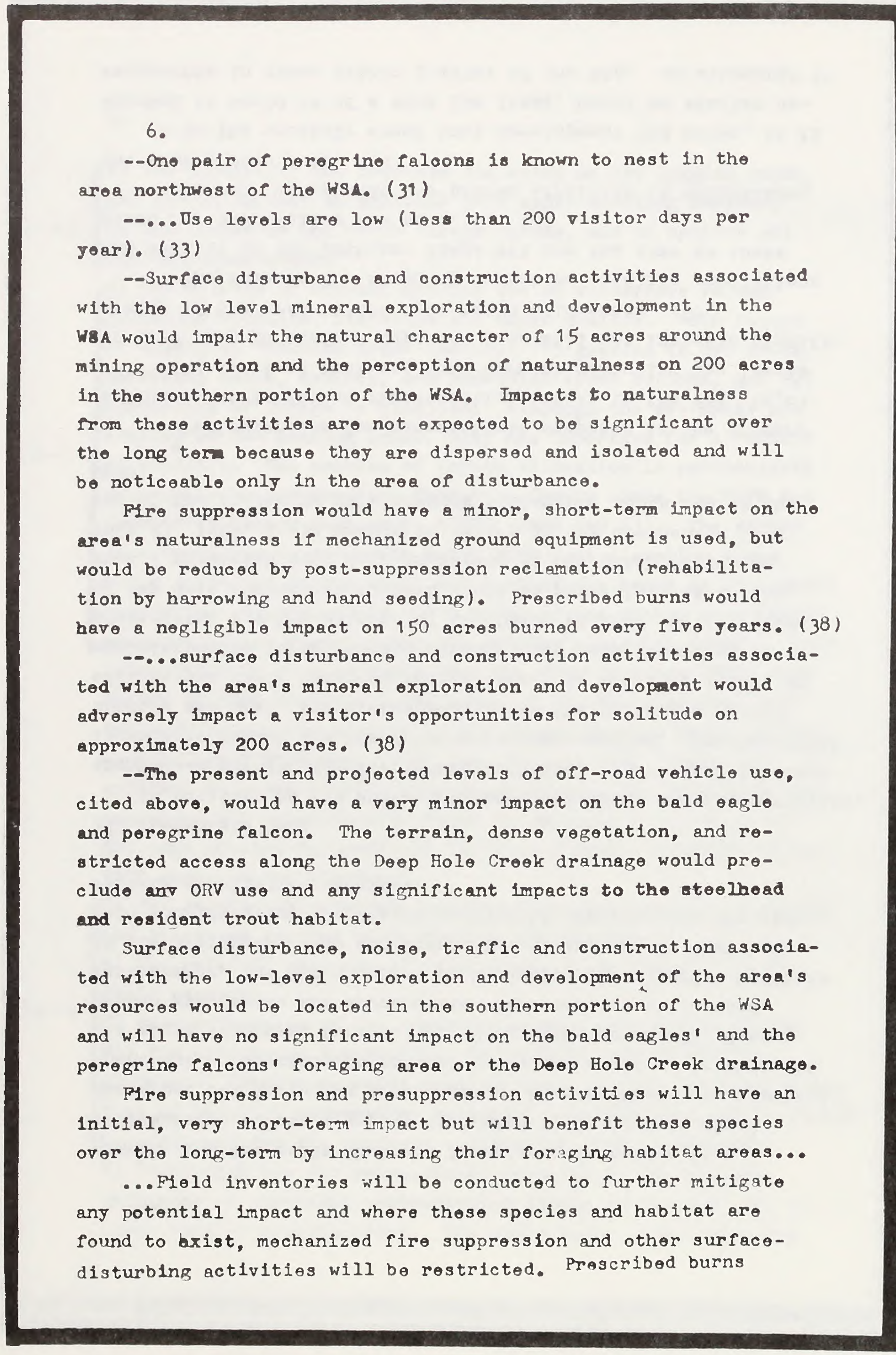
--A black bear concentration area has been delineated along Elk Creek. (27)

--There is a moderate potential for the occurrence of copper, manganese, chromite, and platinum in the WSA. (27)

--There is a high potential for the occurrence of very low-grade coal in the western part of the WSA. (28)

--The eastern half of the WSA is prospectively valuable for geothermal resources. (28)

--This action was determined to be nonimpairing to wilderness suitability and was documented in an environmental assessment. (28)



--One pair of peregrine falcons is known to nest in the area northwest of the WSA. (31)

--...Use levels are low (less than 200 visitor days per year). (33)

--Surface disturbance and construction activities associated with the low level mineral exploration and development in the WSA would impair the natural character of 15 acres around the mining operation and the perception of naturalness on 200 acres in the southern portion of the WSA. Impacts to naturalness from these activities are not expected to be significant over the long term because they are dispersed and isolated and will be noticeable only in the area of disturbance.

Fire suppression would have a minor, short-term impact on the area's naturalness if mechanized ground equipment is used, but would be reduced by post-suppression reclamation (rehabilitation by harrowing and hand seeding). Prescribed burns would have a negligible impact on 150 acres burned every five years. (38)

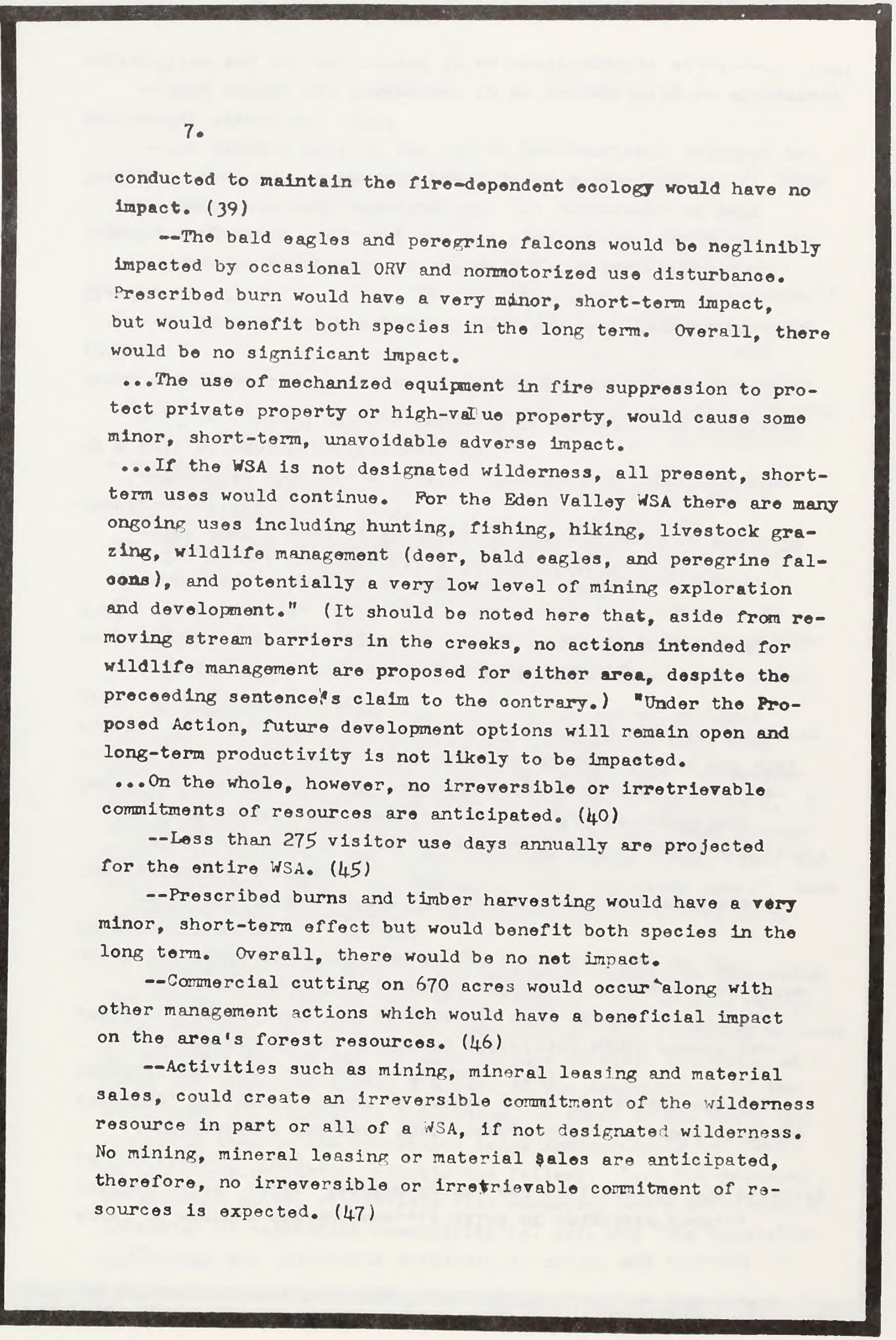
--...surface disturbance and construction activities associated with the area's mineral exploration and development would adversely impact a visitor's opportunities for solitude on approximately 200 acres. (38)

--The present and projected levels of off-road vehicle use, cited above, would have a very minor impact on the bald eagle and peregrine falcon. The terrain, dense vegetation, and restricted access along the Deep Hole Creek drainage would preclude anv ORV use and any significant impacts to the steelhead and resident trout habitat.

Surface disturbance, noise, traffic and construction associated with the low-level exploration and development of the area's resources would be located in the southern portion of the WSA and will have no significant impact on the bald eagles' and the peregrine falcons' foraging area or the Deep Hole Creek drainage.

Fire suppression and presuppression activities will have an initial, very short-term impact but will benefit these species over the long-term by increasing their foraging habitat areas...

...Field inventories will be conducted to further mitigate any potential impact and where these species and habitat are found to exist, mechanized fire suppression and other surface-disturbing activities will be restricted. Prescribed burns



conducted to maintain the fire-dependent ecology would have no impact. (39)

--The bald eagles and peregrine falcons would be neglinibly impacted by occasional ORV and nonmotorized use disturbance. Prescribed burn would have a very minor, short-term impact, but would benefit both species in the long term. Overall, there would be no significant impact.

...The use of mechanized equipment in fire suppression to protect private property or high-value property, would cause some minor, short-term, unavoidable adverse impact.

...If the WSA is not designated wilderness, all present, short-term uses would continue. For the Eden Valley WSA there are many ongoing uses including hunting, fishing, hiking, livestock grazing, wildlife management (deer, bald eagles, and peregrine falcons), and potentially a very low level of mining exploration and development." (It should be noted here that, aside from removing stream barriers in the creeks, no actions intended for wildlife management are proposed for either area, despite the preceeding sentence's claim to the contrary.) "Under the Proposed Action, future development options will remain open and long-term productivity is not likely to be impacted.

...On the whole, however, no irreversible or irretrievable commitments of resources are anticipated. (40)

--Less than 275 visitor use days annually are projected for the entire WSA. (45)

--Prescribed burns and timber harvesting would have a very minor, short-term effect but would benefit both species in the long term. Overall, there would be no net impact.

--Commercial cutting on 670 acres would occur along with other management actions which would have a beneficial impact on the area's forest resources. (46)

--Activities such as mining, mineral leasing and material sales, could create an irreversible commitment of the wilderness resource in part or all of a WSA, if not designated wilderness. No mining, mineral leasing or material sales are anticipated, therefore, no irreversible or irretrievable commitment of resources is expected. (47)

--The position of FWS regarding the timing of Section 7 consultation for WSAs with endangered species that may be affected by future management actions will be documented in the final EIS. (51)

III. One More Look

"We followed the rules of evaluation," said BLM State Director, Ed Hastey, at a pulic "round table" in Ukiah on Sept. 11. His remark was in reference to the Eden-Thatcher WSAs. If the words "very poorly" were amended to his statement, then the truth of his words would be expressed in a clearer light. BLM's policy of bias against wilderness in this document is clear enough, but the reasoning for that bias ("to allow full development of the public land," as Mr. Hastey also put it that night) is not consistent with the intent of the Wilderness Act, nor with the "Wilderness Study Policy" for BLM, published in the Federal Register Vol. 47, no. 23: "BLM also recognizes wilderness as a resource which fits within the framework of multiple-use on the public lands"(5103).

In the "Guidelines for Applying the Planning Criteria", the first criterion is "Evaluation of Wilderness Value." In explanation of the four components which are distinguished within this criterion, it is stated that

> Every effort should be (made) to provide an equal assessment of the full range of benefits and values which only wilderness designation could insure for the area. All four of these components must be fully evaluated and documented in determining an area's value as wilderness. (5104)

These components are:

1. Quality of Mandatory Wilderness Characteristics

A. Naturalness

Virtually all of the Study Areas are in an undisturbed condition. Human imprints within the WSA's are in the form of firebreaks and mostly chapparal-reinvaded 4 wheel drive trails. Thesee imprints are substantially unnoticeable from within the WSA's themselves.

Grandfathered uses and valid exiting rights are not known to be conflicting with wilderness values.

B. Outstanding Opportunities for Solitude or Primitive and Unconfined recreation

1. Solitude: Both areas are very isolated, with only two habitations within several miles. The opportunities for finding lonely, unfrequented and secluded places is much greater in the WSA's then in the designated Yolla (cont.)

14-5

Bolly-Middle Fork Eel Wilderness.

a. The total size of the WSA's is approximately 16,000 acres for Thatcher and 7,000 acres for Eden Valley, with (again) about 25,000 FSRA contiguous acres.

b. Topographic screening, largely the result of the steep terrain, further insures opportunities for solitude.

2. Primitive and Unconfined Recreation: Outstanding opportunities for dispersed, undeveloped recreation exists within the WSA's, especially during the Fall-WintSpring months. Sizable herds of black tail deer use the WSA's for winter browsing and migrate through the WSA's in numbers impressive to the hunter and Nature observer alike. Steelhead trout spawn in both Thatcher and Elk Creeks and the latter's major tributaries also. The high quality of these unusually low-elevation primitive recreation opportunities should be critically considered.

2. Special Features: Quality of the Area's Optional Wilderness Characteristics

The northern chapparal plant community (chemise,buckbrush, manzanita, and associate species) which dominates the vegetation of both WSA's forms a large U-shaped mapping pattern, and is bordered on its outside limits by large and small patches of northern mixed evergreen and oak woodland-savannah communities. Winding its way throughthese communities and giving them their shape is the Middle Fork Eel. This special riprian habitat represents the most undisturbed remnant of the Eel River in the Entirety of Mendocino Co. The resulting vegetative band of thick-cover brush above the riparian and below the savannah bands forms a remarkably extensive edge-effect (ecotone) which supports an abundance of wilderness-associated species, including black bear, mountain lion, and golden eagles. Bald Eagles also use this portion of the Middle Fork Eel (and likely the Elk and Thatcer Creeks also) as a winter feeding area, salmon being their principal substinence. Considering the historical-level abundance of the deer migrations, the WSA's suggest special values for scientific, recreational and conservation use.

3. Multiple Resource Benefits

A protective wilderness status for the winter-browse Fall-Spring migration habitats of the deer herds would insure their continued viability. Wilderness designation would also insure improvement of water quality and salmon and steelhead spawning

habitat, which in turn would insure the long term seasonal use of the area by bald eagles. Cooperative wilderness management of the entire de facto area with MNF would preserve overall watershed, wildlife and visual resources.

4. Diversity in the National Wilderness Preservation System

By adding the low-elevation and abundant wildlife characteristics of the two WSA's to the National Wilderness Preservation System, a unique example of an intact ecosystem would be preserved. Opportunities for primitive recreation and solitude, especially during the winter months when all non-coastal designated and potential wilderness areas in the SMSA are snowbound, would be afforded.

The multiple resource benefits of wilderness management of the WSA's would be consistent with expected uses and acttivities in the area. The shallow soils, with steep and very steep slopes, are not suited to type-conversion or other forms of development.

III Guidelines for Satisfying Quality Standards

1. Presence of Energy and Mineral Resource Values: Geological mappings of the area indicate no energy resource values and very low mineral resource values.

2. Impacts of Wilderness Designation on Other Resources: Wilderness designation would be compatible with other resource uses of the WSA's. Wilderness designation would be the most effective management recommendation in preventing "Unnecessary and undue degradation of the lands"(5100).

3. Impacts of Nondesignation on Wilderness Values: A full range of impacts upon the wilderness resources should be developed to uncover the effect of any nonsuitable recommendation.

4. Local,Soial and Economic Effects: Wilderness designation and management would highlight a local resource of high quality, with its opportunities for solitude and primitive recreation, fisheries and wildlife. These wilderness values are local social values, and the enhancement of recreational opportunities would be of favorable economic effect. Less than 5,000 acres in Mendocino County have been designated or recommended for wilderness. This represents less than .3% of the total acreage (2,246,400) of the County. The Elk-Thatcher de facto wilderness area is the largest potential wilderness area remaining in Mendocino County.

14-6 5. Consistency with Other Plans: Officially approved and adopted resource-related plans of State and local governments include the

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State Wild and Scenic Rivers Act and the Mendocino County Salmon and Steelhead Managment Plan. Wilderness designation would be consistent with these as well as enhance the pertaining federal Wild and Scenic classification for the Middle Fork Eel.

None of my extensive personal experiences in designated and candidate wilderness areas throughout the northwestern California region can match the quality of those which i've had in the Eden-Thatcher WSAs. For primitive recreation and opportunities for solitude, the WSAs are outstanding. For nature observation and animal tracking, the diversity of habitat ecotones and their many and varied wildlife inhabitants, the WSAs have unparalleled value. I believe that BLM is remiss in its present assessments and recommendations for the Eden Valley and Thatcher Ridge WSAs. Both areas desrve and should receive All-Wilderness recommendations.

Sincerely,

James Arthur Ferrara

J. A. Ferrara
For the Mendocino Public
Lands Task Force

c; Lynn Ryan, Sierra Club, Redwood Chapter

COMMENT LETTER 15

RECEIVED
SEP 2 - 1986
BLM
Ukiah, DO

THE CITIZEN'S COMMITTEE TO SAVE OUR PUBLIC LANDS
P.O. BOX 1471 WILLITS, CA 95490
707-459-2643

Tuesday, August 26th, 1986

Bureau of Land Management
Ukiah District Office
P.O. Box 940
Ukiah, Ca. 95482

Dear Sirs:

The Citizen's Committee to Save Our Public Lands supports Wilderness for all of the Eden Valley and Thatcher Ridge Roadless Areas.

With the exception of the neigboring Eden Valley Roadless Area, the Thatcher Ridge Roadless Area is surrounded by either private lands or the Mendocino National Forest. All of the private lands have been, or are being logged. Likewise, none of the surrounding National Forest lands will be sparred from logging. There will not be a stand of old growth timber from Eden Valley to the Sacramento Valley, nor will there be any old growth within a 30 mile radius of the Thatcher Ridge Roadless Area. Thatcher Ridge's 670 acres of "commercial timber" will be the only old growth in a 50 mile stretch of "forest" from Snow Mt. to the Yolly Bolly. 15-1

The DEIS claims that logging 5 million board feet from this 670 acres would have a "minor" negative impact on the environment, and would be balanced by positive impacts, such as the"opportunity to plant trees". This is of course ludicrous. Any old growth dependent species (along with the old growth) would be destroyed as there will be nowhere to which it might retreat. You cannot claim that cutting the only stands of old growth left in a 50 by 30 mile corridor of what was once all forest constitutes NO ACTION! Yours is not a NO ACTION alternative, it is an old growth liquidation alternative, with all its accompanying consequences to forest genetics, wildlife, etc.

This is the action your DEIS must analyse - old growth liquidation - and until it does so the DEIS is misleading, inaccurate, inadequate, and illegal .

The Eden Valley Roadless Area has at least two very precious and unique components: the unusual serpentine soils in the northern portion which support a unique stand of Sargent Cypress and its associated community of rare plants; and the essentially undisturbed watershead of Deep Hole Creek, the only remaining undisturbed tributary flowing from the west into Elk Creek, historically the Middle Fork Eel's richest anadromous tributary.

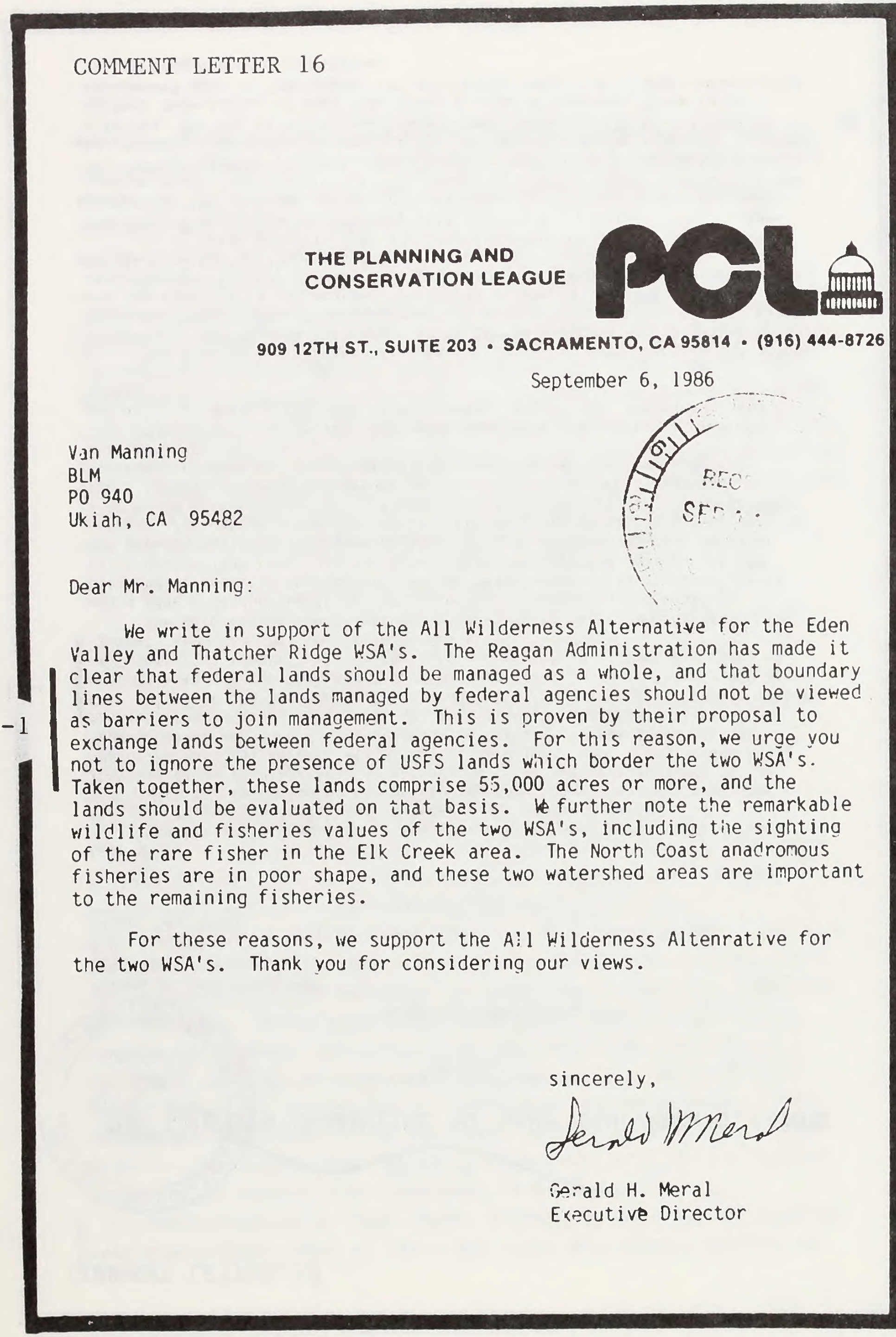
It is quite possible that the property owner to the north, onto which the Sargent Cypress stand extends, will destroy his portion of this unique community. (He is known to have refused access onto his property for fear someone might find "a rare lilly or something", which would "just get in the way" of his plans.) It may be that that community's occurrence on public land may be the only opportunity to protect it. The best protection from road building, clearing, ORV use is Wilderness designation. Likewise, the best insurance against degradation of Deep Hole Creek is also Wilderness. There is no documented case of "management" of a stream's habitat or fishery maintaining or improving historic conditions.

page 2.

15-2 Though it may be true that probable use of the Eden Valley Roadless Area in the near future will not significantly change its character, the DEIS must consider possible uses and their consequences. For example, is it possible that BLM will want to log the old growth from Deep Hole canyon? What would the consequences be? What if the property owner to the north decided to clear his Sargent Cypress stand? How small a population is self-sustaining, and how would that information affect BLM's treatment of the area? What if the serpentine associated metals were to be mined, or the geothermal potential found to be worth exploiting? What would be the impact on wildlife, fisheries, fire hazard, etc.? A so-called "NO ACTION" alternative today could mean a major action in 5 or 10 years.(Wilderness designation is essentially the maintenance of existing conditions, i.e., no action.)

The DEIS must analyse these possible impacts in order to be a planning tool, and until it does so it is misleading, inaccurate, inadequate, and illegal.

Ellen Drell
Ellen Drell
Citizen's Committee to Save Our Public lands



COMMENT LETTER 16

THE PLANNING AND
CONSERVATION LEAGUE
PCL
909 12TH ST., SUITE 203 • SACRAMENTO, CA 95814 • (916) 444-8726

September 6, 1986

REC
SEP

Van Manning
BLM
PO 940
Ukiah, CA 95482

Dear Mr. Manning:

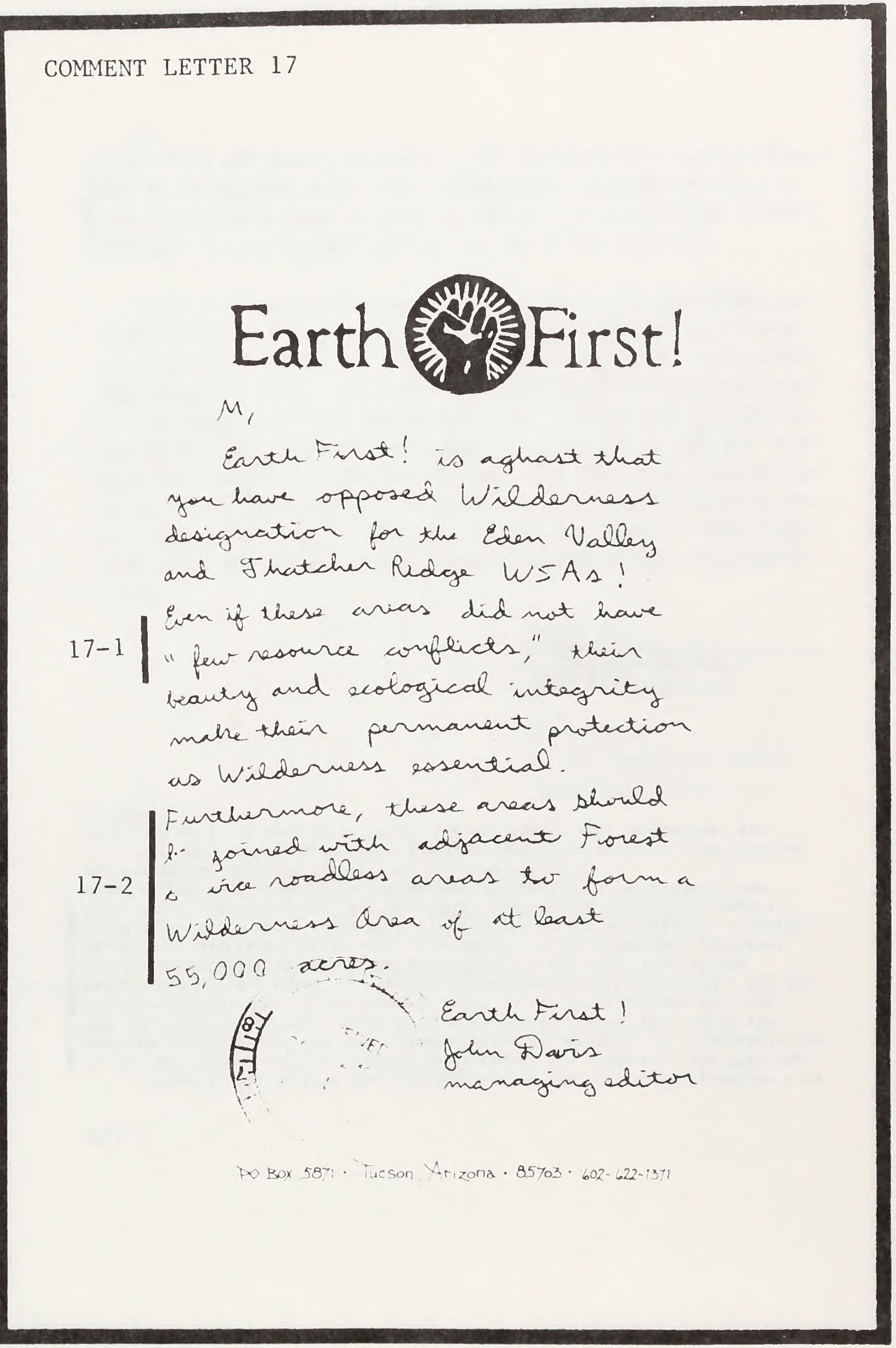
We write in support of the All Wilderness Alternative for the Eden Valley and Thatcher Ridge WSA's. The Reagan Administration has made it clear that federal lands should be managed as a whole, and that boundary lines between the lands managed by federal agencies should not be viewed as barriers to join management. This is proven by their proposal to exchange lands between federal agencies. For this reason, we urge you not to ignore the presence of USFS lands which border the two WSA's. Taken together, these lands comprise 55,000 acres or more, and the lands should be evaluated on that basis. We further note the remarkable wildlife and fisheries values of the two WSA's, including the sighting of the rare fisher in the Elk Creek area. The North Coast anadromous fisheries are in poor shape, and these two watershed areas are important to the remaining fisheries. 16-1

For these reasons, we support the All Wilderness Altenrative for the two WSA's. Thank you for considering our views.

sincerely,

Gerald H. Meral

Gerald H. Meral
Executive Director



COMMENT LETTER 17

Earth First!

M,

Earth First! is aghast that you have opposed Wilderness designation for the Eden Valley and Thatcher Ridge WSAs!

17-1 Even if these areas did not have "few resource conflicts," their beauty and ecological integrity make their permanent protection as Wilderness essential.

17-2 Furthermore, these areas should be joined with adjacent Forest Service roadless areas to form a Wilderness Area of at least 55,000 acres.

Earth First!
John Davis
managing editor

PO Box 5871 · Tucson, Arizona · 85703 · 602-622-1371

COMMENT LETTER 18

SEPTEMBER 15, 1986

VAN MANNING, DISTRICT MANAGER
BUREAU OF LAND MANAGEMENT
UKIAH DISTRICT OFFICE
555 LESLIE STREET
UKIAH, CALIFORNIA 95482

DEAR MR. MANNING,

I have reviewed the DEIS preliminary Wilderness recommendations for Eden Valley and Thatcher Ridge WSAs in the Arcata Resource Area. The following comments* are based on my analysis of the DEIS (pages referenced in parenthesis)

ENVIRONMENTAL ANALYSIS (p.iii, item 2)

"BLM has analyzed the impacts and resource tradeoffs of proposals to designate or not designate the WSAs as wilderness.

PURPOSE OF EIS (p.iv, par. 1)

"The purpose of this EIS is to determine the suitability of the two WSAs for inclusion in the National Wilderness Preservation System.. .. This EIS assesses the environmental consequences of managing these WSAs as wilderness or non wilderness."

WILDERNESS REVIEW PROCESS (p.1, Ch. 1, par 3)

"The inventory phase...involved examining the public lands to determine and locate the existence of areas containing wilderness characteristics that met the criteria established in the Wilderness Act of 1964 (wilderness is essentially an area of undeveloped Federal land in a natural condition, without permanent improvements or human habitation, which has Outstanding opportunities for solitude or a primitive and unconfined type of recreation.) The area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value).

- The Eden-Thatcher WSAs met these criteria, sc they were included in the Wilderness review process.

SELECTION OF PROPOSED ACTION (p. 7&8)

"Eden Valley & Thatcher Ridge WSAs recommended for No wilderness/ No Action and continued management for multiple-use".

RATIONALE FOR PROPOSED ACTION:

18-1 1) Wilderness values for the most part are not outstanding

- By definition, (1964 Wilderness Act) Wilderness must have outstanding values before it can be included in the review process. Why were these WSAs included in the Wilderness review process if they didn't have outstanding values?

18-2 2) The current use levels have had no detrimental effect on existing wilderness values.

- On page 37, paragraph 2, BLM admits that the Environmental/Resource Analysis lacks numerical and statistical information. If so, how can BLM substantiate the above absolute statement?

3) Projected use levels will not increase enough to significantly affect these values.

- Since BLM admits that the Environmental/Resource analysis lacks numerical and statistical information, how can they rationalize the above statement?

4) Current management has proven effective in managing the area's existing resources.

- Again, without numerical and statistical data, how can this absolute statement be substantiated?

5) No significant conflicts have been identified.

- Without numerical and statistical information it's obvious why no conflicts have been identified. Potential conflicts caused by increased ORV uses, mining, mineral development, material sales, grazing and logging would become evident if more detailed information were available.

ENVIRONMENTAL CONSEQUENCES (Ch. 4)

(p.37, par. 2) "Because of the general nature of this analysis and the lack of numerical and statistical information regarding the area's resources, impacts in this chapter are often expressed in relative terms."

(p. 38) IMPACT ON WILDERNESS VALUES (EDEN VALLEY)

"The short-term impacts (0-5 years) and forseeable long-term impacts (5 or more years) of this action would be negligible since little development activity or increased motorized recreational use is anticipated whether or not the area is designated Wilderness."

(p. 43) IMPACT ON WILDERNESS VALUES (THATCHER)

"There is no recreation planned and only a slight increase in ORV use is anticipated. Timber harvest would create some minor surface disturbances in the extreme northern and southern portions of the WSA, but these would be short-terM".

- BLM claims "minor" negative impacts on wilderness values, sensitive plant species habitat, Endangered Species habitat, Riparian habitat, and Anadromous Fish, under the proposed multiple-use management for both WSAs based on a "projected" slight increase in ORV use, and mining/ mineral development that is "not anticipated". BLM admits that this management decision is rationalized by a "general analysis" of the areas' resources based on a "lack of numerical and statistical information".

- The decision to deny wilderness to the Eden-Thatcher WSAs is based primarily on the assumption that low projected levels of multiple-use activities would only have a "minor" negative impact on existing wilderness values. Therefore, multiple-use management is justified on the grounds that we can have our cake and eat it too - multiple-use wilderness. Yet, there is no data to support this conclusion.

18-3 If ORV use increased beyond "projections" and mining activity required more environmental disturbance than"anticipated", then wilderness values would be significantly impacted. This whole rationalization seems contrived. If BLM claims the WSAs are not suitable for wilderness, then why are they rationalizing multiple-use on the grounds that "projected" levels of activities would not significantly impact wilderness values? This just isn't true. In BLM's own words (p.47), "If the WSAs are not designated wilderness, all present, short-term uses would continue. Off-road vehicle use, mining and mineral leasing activities could reduce wilderness values over the long-term". Activities such as mining, mineral leasing and material sales, could create an "irreversible commitment of the wilderness resources in part or all of a WSA."

BLM has opted for short-term exploitation at the expense of long-term productivity.

During the discussion period after the public hearing on July 23,1986 BLM staff admitted that the lack of information was due in part to difficulty gaining vehicular access to the WSA's, since this required getting permission from adjaecent property owners to cross their property. 18-4 It was revealed that managing as wilderness would probably be very difficult because it would be next to impossible to prevent vehicular access from the adjoining private properties. This significant issue was not mentioned in the DEIS. Is this public land open to the public, or is this public land open only to those who pass muster at adjaecent property owners gates?

SUMMARY AND CONCLUSIONS

BLM admits Eden-Thatcher Wilderness is qualified for Wilderness preservation under the requirements of the Wilderness Act of 1964 (i.e. it has outstanding Wilderness valuas.)

BLM subjectively finds Eden-Thatcher unsuitable for Wilderness preservations primarily because it is visually monotonous and therefore "not outstanding" or unique. This is contradictory and is not justified by any numerical or statistical information.

BLM rationalizes management for multiple-use, rather than wilderness, ostensibly because the "anticipated" levels of multiple-use activities will have "no significant" impact on existing wilderness values. This assumption is based on a "general analysis" of the areas' resources without the aid of "numerical and statistical information".

The projected levels of multiple-use (ORV-slight increase and mining/mineral exploration - none anticipated) which could have significant impacts on Wilderness values are not based on numerical or statistical information.

Since no mining or mineral leasing is anticipated, BLM is apparantly recommending multiple-use rather than Wilderness for the benefit of two special interest groups - timber companies and ORV users who can get permission to cross adjaecent private lands.

Since vehicular access to both WSAs apparently is limited to those who can get permission to cross adjaecent property owners land, it appears that Eden-Thatcher Wilderness will be continuously managed, at public expense, for the multiple-use benefit of adjaecent land owners and their cronies.

Therefore, BLM recommends that Eden-Thatcher Wilderness continue to be "publicly managed" as a "private" ORV riding, grazing, timbering, hunting and fishing club.

I find the DEIS totally inadequate and have the following questions which should have been answered satisfactorily by the DEIS:

18-5
1) What numerical or statistical information was used to determine existing and projected ORV use?
2) What numerical or statistical information was used to determine existing mineral deposits and project potential future mining and mineral exploration activities?
3) What numerical or statistical information was used to determine existing,potential,and transient wildlife populations?
4) What numerical or statistical information was used to determine the existing and future impacts of livestock grazing?
5) How would livestock be more closely regulated under Wilderness management? How is it regulated now?
6) What numerical or statistical information was used to determine the impacts of logging 640 acres of old-growth douglas-fir in Thatcher Ridge WSA ?

18-6
7) What numerical or statistical information was used to determine the location of 523.37 acres of suitable commercial forest land in Eden Valley WSA? Why weren't these isolated parcels of CFL shown on the Eden Valley WSA existing resources map? How close are these CFL parcels to adjaecent private properties and private inholdings owned by EEL RIVER SAWMILLS and ROBERT HARRAH? Management for CFL would have potential future negative impacts (i.e. road construction, erosion, herbicide use, etc.) Why were these impacts not considered?

18-7
9) Why wasn't the problem of vehicular access addressed in more detail since continued ORV use was one of the multiple-uses to rationalize justification of No Wilderness/No action.
10)The following "large" property owners own nearly all the private lands adjoining the WSAs: Louisiana Pacific Corporation, Berenda,N.V., Robert Harrah, Eel River Sawmills, Walter & Wanda Johnson, and Victor Fresquet. It appears that these property owners control all the existing vehicular access roads into the WSAs. Before justifying managing the WSAs for "public multiple-use", the BLM must satisfactorily answer the following questions:

18-3 11) Are the private property owners adjaecent to the WSAs legally bound to give access across their properties for purposes of entering the "publically managed" BLM land to any of the following?

- ORV users for recreation ________
- Logging Trucks for purchased timber harvest ________
- Vehicles used for mining & mineral exploration ______
- BLM employses in Government Vehicles________
- Backpackers, hunters, fishermen, birdwatchers, etc. ________ (entering on foot across ORV roads)

Can refusal to allow access to any of the above be given for any reason? If so, the BLM is managing public land at public expense for the private use of a few wealthy individuals and large corporations.

Each year we see land that once was Wilderness receive the blessings of what is called "multiple-use". First come the bulldozers, then the loggers and logging trucks. Then the ORV riders, riding just to be riding, or perhaps trying to shoot a deer, elk, eagls, etc. without the honest sweat that should be a part of any hunt. California has already lost some of its choicest wild country and the government proposes to open up still more of our publically owned roadless areas to development. So, we're not looking at how much more wilderness we're going to have, but how much less of it there will be. "Real" multiple-use is practiced by nature. The best thing we can do is leave it alone. The very qualities that make land unsuitable for development, make it valuable for enjoyment. Protecting the watershed protects the habitat for salmon, steelhead and trout. Protecting the forests protects habitat for game. We don't have to do anything to enhance natural beauty. Nature can "manage" itself. On the other hand, it's impossible to re-create it once you've reduced a pristine area to forestless stumps, slashed and silted rivers and streams and bovinely denuded and trampled meadows.

Eden-Thatcher Wilderness should be granted full Federal Protection. We should save Wilderness for it's own sake - because it's wild.

Sincerely,
Don Morris
Don Morris

P.O. Bx 1551
Willits CA 95490

cc: Senator Alan Cranston
Senator Pete Wilson

100% recycled paper

COMMENT LETTER 19

2239 Blake Street
Berkeley, California 94704
September 17, 1986

District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, California 95482

Re: Comment on Draft Environmental Impact Statement for Thatcher Ridge and Eden Valley Wilderness Study Areas

Dear Sir,

I wish to express my support for the full wilderness recommendation alternative for these two wilderness areas, totaling 23,861 acres. These areas lack any significant resource conflicts and possess outstanding natural and recreational values that should be preserved. I would like to emphasize the following points:

1. These two areas are comprised of extremely rugged terrain, allowing for a great measure of solitude and isolation for the human user, fulfilling two of the principal criteria of the Wilderness Act.

19-1 2. These two areas are virtually unspoiled natural areas, untrammeled by human impacts; they are contiguous to wilderness quality lands within the Mendocino National Forest and represent an excellent opportunity for the BLM and the Forest Service to plan an easily manageable and readily protected wilderness area.

3. Both areas provide habitat for a wide array of wildlife, including golden eagles, ringtail cats, otters, tule elk, deer and black bear, as well as such endangered species as the peregrine falcon and the bald eagle.

4. These de facto wilderness areas are watersheds for important spawning and nursery areas for anadromous fish such as steelhead and salmon in the Eel river drainage. Such areas are crucial to maintaining viable California fisheries and could best be protected by wilderness status.

The resource conflicts surrounding these lands are nil:

1. There is no current or proposed mining in the area.

2. There is insignificant timber potential; the cost of road construction into this now-roadless area would be prohibitive even if harvestible timber did exist.

3. Use by livestock is minimal and would in any event be continued under the provisions of the Wilderness Act.

4. Motorized recreational use of the area is minimal; little or no conflicts with existing recreational uses would result from off-road-vehicle closures consequent upon wilderness designation.

5. Outdoor recreation, including fishing, hunting and backpacking hold great potential for significant contributions to the economic development of Northern California. If this potential is to be realized, it is imperative that the responsible agencies protect and, if possible, expand the land base (including designated wildernss areas) that supports it. Demand for such recreational opportunities shows no sign of abating and the BLM should recognize its responsibility to meet this need by enlarging the National Wilderness System.

The BLM's current draft recommendation for "no wilderness" flies in the face of all reason and consistency with federal statute and regulation governing land use planning and wilderness study. The data and analysis contained in the DEIS do not support the conclusion that the BLM has drawn in its draft recommendation. The BLM has a rare opportunity to protect a significant part of the public domain for its natural values without foregoing other resource uses. As a visitor to this area, and other public lands in the coast range, I strongly recommend that the BLM reconsider its ill-advised and prejudicial stance towards these two WSA's. I further urge the BLM to work with the Forest Service to prepare a joint wilderness recommendation encompassing suitable contiguous lands under both agencies' jurisdictions; these lands could constitute a single wilderness area for maximum efficiency in protection and conservation.

Thank for this opportunity to comment upon the DEIS.

Very truly yours,

Jonathan M. Teague

Jonathan M. Teague

COMMENT LETTER 20

September 9, 1986

Van Manning, District Manager
Bureau of Land Management
P.O. Box 940
iah, CA 95482

Dear Mr. Manning:

I am writing to communicate strong support for the
All Wilderness Alternative for the Thatcher Ridge and
Eden Valley Wilderness Study Areas. Adjacent U.S.
Forest Service roadless lands should be considered
when evaluating these Wilderness Study Areas since
the resultant potential wilderness tract of at least
55,000 acres significantly enhances the wilderness
values possessed by the smaller areas when considered
in isolation. These values are significant since
the diverse mosaic of vegetation that has developed
in northwestern California on the Franciscan Formation
is very underrepresented in the National Wilderness
System. The distinctive geomorphology of the Franciscan
20-1 melange, especially in those areas like Eden Valley
where serpentinite is present, produces exceptional
vegetational diversity and is a unique product of
western North America's tectonic history. I believe
wilderness designation is the most appropriate means
of protecting Eden Valley and Thatcher Ridge Wilderness
Study Areas.

Sincerely,

Dr. Glen L. Holstein
1509 Pacific Dr.
Davis,
CA 95616

COMMENT LETTER 21

AUG 1 1986

William R. LeJoge
P.O. Box 1245
San Leandro, CA 94577

Van Manning,
District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482

Dear Mr. Manning

I am writing in regards to the
Eden Valley and Thatcher Ridge Wilderness
Study Areas. I believe that these areas
(perhaps with small boundary adjustments)
should be recommended for wilderness designation.
I realize that these two areas
are not as scenic as the High Sierra;
in fact, they are mostly brushland.
However, recreation and scenery are not
the only reasons for designation of wilderness
areas. Wilderness areas provide
samples of undisturbed ecosystems,
and thus have an important scientific
value. At present, no component of
the National Wilderness Preservation System
21-1 provides a good example of North Coast
Range chaparral. These 2 areas provide
an opportunity to preserve large samples
of this ecosystem.

These 2 areas have little in the
way of resources that would be forgone
under wilderness designation. In addition,
with construction of new trails they
could become valuable for winter and
spring recreation. The only real potential
problem is with fire management.
21-2 I realize that fire management of
brushland is more difficult in wilderness
areas. Legislation to establish
these wilderness areas would have

to authorize construction of several fuel-breaks, and a prescribed burning program to restore natural levels of fuel loading. Upon completion of a prescribed burning program, the areas would be more natural than at present. An aggressive program of prescribed burning on lands just outside the wilderness would minimize the danger of a wilderness fire (prescribed or natural) causing severe resource losses (e.g. timber) outside the wilderness. In addition, on the Thatcher Ridge WSA, prescribed fires in the spring (when the area is just barely dry enough to burn) would be relatively safe because as they proceed uphill they would run into moister fuels and thus would be unlikely (under proper conditions) to rage out of control through the adjacent and higher Mendocino National Forest.

Thus, wilderness status is practical, and the opportunity costs are minimal. Prescribed burning inside and especially outside the wilderness areas would increase forage for both livestock and wildlife. These areas would add ecological diversity to the wilderness system. They therefore should be recommended for wilderness designation.

Sincerely yours,

Bill LeJaga

COMMENT LETTER 22

Bureau of Land Management
Ukiah District
Box 940
Ukiah, CA.
95482

September 9, 1986

Dear Mr. Manning and BLM Staff,

At the public hearing on July 23, 1986 the testimony presented, supported and confirmed reports that Eden Valley (CA-050-214) and Thatcher Ridge (CA-050-212) are very wild and pristine areas with great benefits to wildlife, rare plants and anadromous habitat if protected with a wilderness designation. In addition, both the District BLM Manager and Area Manager agreed outright that these WSA's meet the mandatory characteristics for Congressional wilderness designation. Yet the DEIS fails to consider the significant environmental effects of a non-suitable designation on the wilderness environment and BLM has failed to make "every effort to provide an equal assessment of the full range of benefits and values which only wilderness designation could ensure for the area" (FR 47 Wilderness Study Policy pg.5104).

22-1 The DEIS presents no major conflicts (low mineral potential, insignificant timber resources and unauthorized ORV use) with wilderness designation. The only arguement BLM has advanced for it's non-suitability is that it is not unique though BLM admits that knowledge of these WSA's is sketchy lacking "numerical and statistical information reguarding the areas' resources" (pg. 37 DEIS). The impacts and environmental consequences are reviewed in "relative terms" (pg.37 DEIS)because of the lack of data and the extent to which the areas' natural values would be foregone as a result of other uses is not adequately addressed. (FR#47 WSP pg.5103 C(c) & pg. 5109 Standard #3)

The isolation and inaccessibility of Eden Valley and Thatcher Ridge enhances their manageability as a wilderness area in the long term. BLM is also mandated by Congress to protect public values;natural, cultural, scenic, watershed, ecological and geological. The "multiple resource benefits" clause of BLM's Wilderness Study Policy states that "wilderness can also provide a range of benefits to other multiple resource values and uses which are of significance to the American people . These may include protection of watersheds,

water yield, and water quality; protection of wildlife habitat; preservation of natural plant communities; preservation of cultural and archaeological resources; protection of scenic quality and other natural values" (FR#47 pg. 5106). The Endangered American Wilderness Act of 1978 also recognized watershed preservation and wildlife habitat protection as OBJECTIVES of wilderness designation.

The Wild and Scenic Eel River which flows through both WSA's (as stated at the public hearings I believe that the Eden Valley WSA must be reinstated in full including the Northern section)and the DEIS omitted the BLM staff's recommendation that further acquisitions be made in the area) and the anadramous and native fish habitat of Elk Creek deserve protection in the long term. The recreational benefits (pg. 13 DEIS) and watershed protection that would be provided in a wilderness designation outweigh the short term economic gains from logging, road construction, 22-2 overgrazing and mechanized fire supression. Once again, BLM is making decisions about the Wild&Scenic Corridor, through a no Wilderness/no action designation prior to giving the public any information or input as to the ultimate management direction that this document will take. How will the river corridor be managed "in such a manner as to protect and enhance" it's scenic quality (pg. 13 DEIS) when at the same time BLM is committing 670 acres to timber harvest which "could visually impact the Wild &Scenic Corridor as well as possibly increse erosion and debris" (pg. 44 DEIS)? In the consequences section BLM states that these benefits would only be minor although road building and logging , ORV use and grazing are known to increase sedimentation and erosion. (pg. 46 and 49 DEIS)

22-3 Although complete plant inventories have yet to be completed (pg. 11 DEIS) extensive Vegetation Management Programs are proposed under both alternatives. The impacts to the highly erodible soils , rare, threatened and endangered plants and animals is not adeqately addressed. The fire management plan is also not yet complete (pg. 14 DEIS), The DEIS presents little supporting data to the public concerning the fire dependant ecosystem and the whole science of prescribed burning which is at an early stage of development. In general the impacts of these activities on soils and fisheries is minimized throughout the DEIS.

22-4 Does the East Mendocino MFP authorize ORV use in the WSA's ?(pg 9 DEIS- the lands within the WSA would REMAIN OPEN to recreational ORV use) To manage these pristine areas for the reacreational use of a few ORV enthusists rather than to preserve the opportunity for solitude and primitive recreation, BLM is ignoring the mandate and purpose of the Wilderness Act.

22-5 The low elevation mixed forest in an undisturbed state is rare and unique. The Society of American Forresters in a recent paper published on Scheduling the Harvest of Old Growth emphasized the significance of these diverse forests and their importance to wildlife. They stated outright that the best management of these remants would be to leave them in tact while developing second growth reserves. Their main point was the need to preserve the diversity of the forest system so as to maintain their health and ability to maintain wildlife populations at viable levels.

The addition of the Eden Valley and Thatcher Ridge WSA's

to the National Wilderness Preservation System would expand the diversity and addto the geographical distribution of Wilderness Areas in Northern California. Again, we must look at this in the context of rich low elevation sites versus the USFS lands in the higher elevations. In addition less than .3% of Mendocino County is in wilderness designation. These WSA's along with the ELK Creek USFS lands would comprise the largest single roadless area in Mendocino County. The long term gain through protection of fisheries, watershed and wildlife will far outweigh the benefits of logging 5MBF of timber or grazing leases which are subsidized by taxpayers at $5.65 under fair market value.

With respect to wilderness review House report 94-1163 states " in addition to public use values, ultimate designation as wilderness should augument multiple use management of adjacent lands in protecting watershed and water yield, wildlife habitat preservation, preserving natural plant communities and similar natural values ". It has been done before as with the interagency agreement between the USFS and BLM to manage the Yolla-Bolly and in this case must be done again. BLM should withdraw the DEIS on Eden Valley/Thatcher Ridge so that an alternative can be formulated which would include the USFS roadless area in a whole and contiguous wilderness of 50,000 to 60,000 acres.

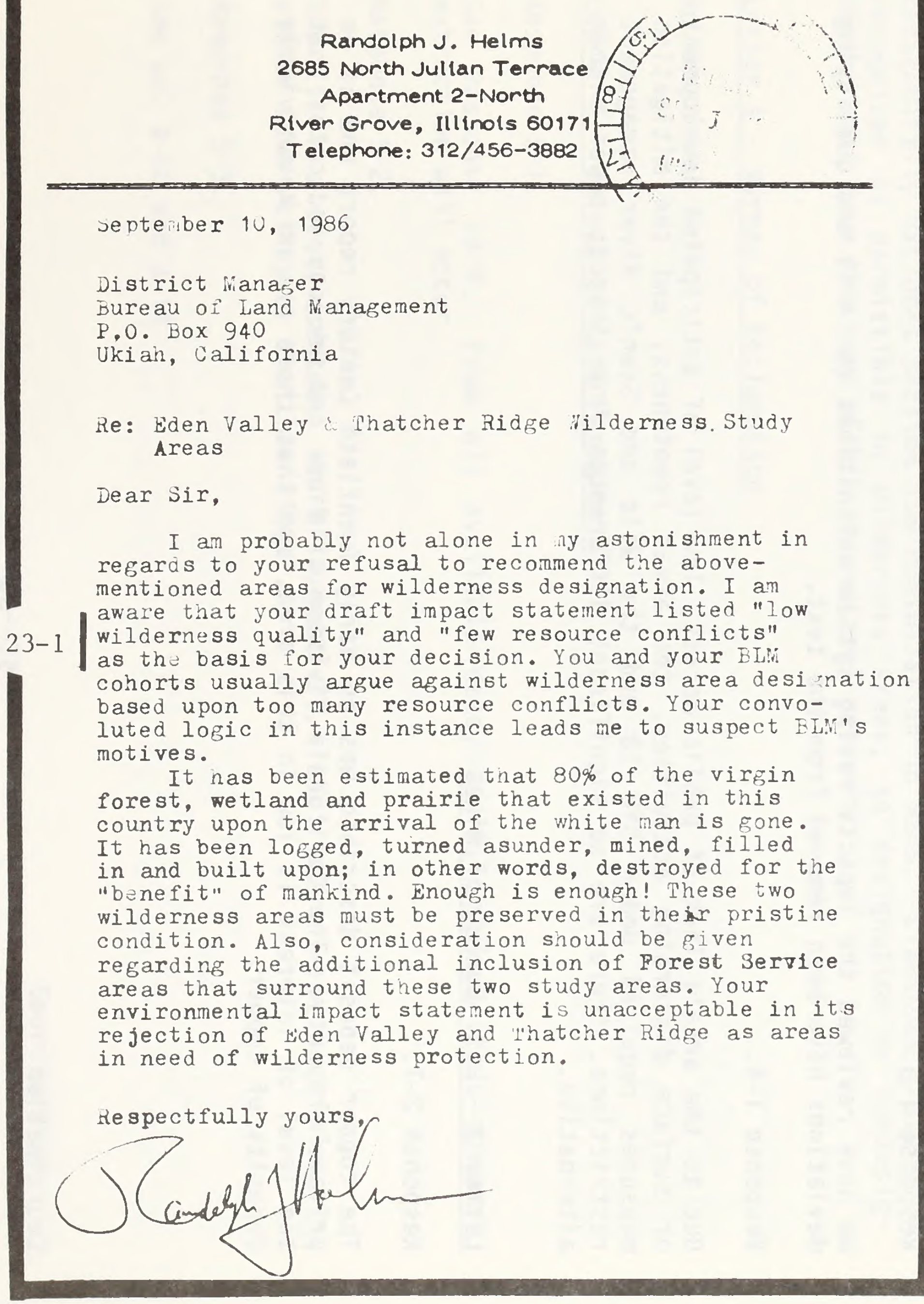
The public lands should be a model for management on private lands. The uses which are allowed to occur must be view in the context of what sort of land use practices are occuring on adjacent lands. The cumulative effects on watershed and wildlife values are becomming increasingly severe necissitating even more care and concern for these values on our public lands.

I believe that BLM has unfairly placed the 'burden of proof' on the public by stating in District Managers words that "changes in recommendations will take place only if new substantive information is raised by the public". As a public agency responsible for managing our lands I firmly believe that the 'burden of proof' is on BLM and now is the time for BLM to rise to the challenge of management for all the forms of life within their fragile ecosystems represented on our public lands.

Sincerely,

Cecelia Gregori
1901 Dutyville Rd.
Garberville, CA.
95440

COMMENT LETTER 23



Randolph J. Helms
2685 North Julian Terrace
Apartment 2-North
River Grove, Illinois 60171
Telephone: 312/456-3882

September 10, 1986

District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, California

Re: Eden Valley & Thatcher Ridge Wilderness Study
Areas

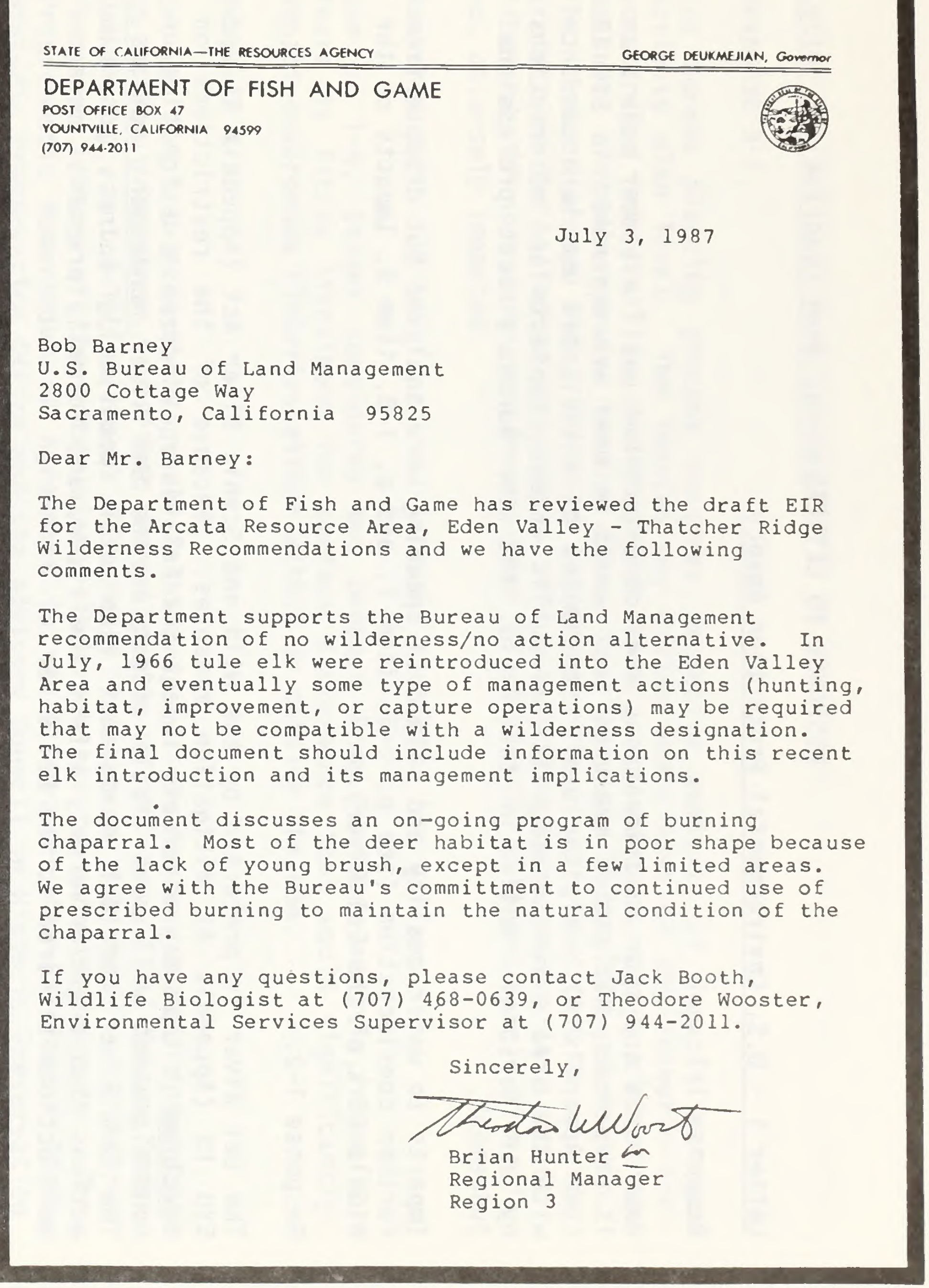
Dear Sir,

23-1 I am probably not alone in my astonishment in regards to your refusal to recommend the above-mentioned areas for wilderness designation. I am aware that your draft impact statement listed "low wilderness quality" and "few resource conflicts" as the basis for your decision. You and your BLM cohorts usually argue against wilderness area designation based upon too many resource conflicts. Your convoluted logic in this instance leads me to suspect BLM's motives.

It has been estimated that 80% of the virgin forest, wetland and prairie that existed in this country upon the arrival of the white man is gone. It has been logged, turned asunder, mined, filled in and built upon; in other words, destroyed for the "benefit" of mankind. Enough is enough! These two wilderness areas must be preserved in their pristine condition. Also, consideration should be given regarding the additional inclusion of Forest Service areas that surround these two study areas. Your environmental impact statement is unacceptable in its rejection of Eden Valley and Thatcher Ridge as areas in need of wilderness protection.

Respectfully yours,

Randolph J Helms



STATE OF CALIFORNIA—THE RESOURCES AGENCY GEORGE DEUKMEJIAN, Governor
DEPARTMENT OF FISH AND GAME
POST OFFICE BOX 47
YOUNTVILLE, CALIFORNIA 94599
(707) 944-2011

July 3, 1987

Bob Barney
U.S. Bureau of Land Management
2800 Cottage Way
Sacramento, California 95825

Dear Mr. Barney:

The Department of Fish and Game has reviewed the draft EIR for the Arcata Resource Area, Eden Valley - Thatcher Ridge Wilderness Recommendations and we have the following comments.

The Department supports the Bureau of Land Management recommendation of no wilderness/no action alternative. In July, 1966 tule elk were reintroduced into the Eden Valley Area and eventually some type of management actions (hunting, habitat, improvement, or capture operations) may be required that may not be compatible with a wilderness designation. The final document should include information on this recent elk introduction and its management implications.

The document discusses an on-going program of burning chaparral. Most of the deer habitat is in poor shape because of the lack of young brush, except in a few limited areas. We agree with the Bureau's committment to continued use of prescribed burning to maintain the natural condition of the chaparral.

If you have any questions, please contact Jack Booth, Wildlife Biologist at (707) 468-0639, or Theodore Wooster, Environmental Services Supervisor at (707) 944-2011.

Sincerely,

Theodore Wooster

Brian Hunter tw
Regional Manager
Region 3

RESPONSE TO LETTERS

Letter 1 - U.S. Environmental Protection Agency

Response 1-1.

Haul roads and spur road locations are not determined until a timber sale plan is prepared. Mitigation measures that would be used are described in SYU 13 (see Appendix A). Visitor use is estimated on anticipated use in accordance with the area's remoteness, lack of public access, contacts and observations by BLM personnel while in the field, and the Bureau's best professional judgement.

Impacts to water quality and salmonoid spawning were analyzed but dropped from further consideration (see p. 1-6, Item 1, and p. 1-8, item 5, Impacts on the Middle Fork of the Eel River).

Response 1-2.

The Eel River is protected by the Wild and Scenic River Act (Appendix B) and SYU 13 (Appendix A) mitigation measures. Because of the restrictions on development that may adversely impact the Eel River, wilderness designation or nondesignation will have little effect on the Eel River management actions. The Eel River Corridor Management Plan will specifically address possible actions that might adversely affect the river, and formally prescribe management actions tailored to the Eel River.

Response 1-3.

We have reviewed the impacts rating system definitions (p. 4-1) and qualifying deviations have been removed from the text.

Response 1-4.

Due to the area's lack of public access, low level of anticipated development or surface disturbing activities, the areas remoteness, and the mitigation measures required under SYU 13 and the Wild and Scenic River management restrictions, there are no significant differences from impacts under either alternative.

Letter 2 - U.S. Bureau of Mines

Response 2-1.

The copper deposit described was an early Twentieth Century report and is on private property. The California Division of Mines and Geology indicates that the level of interest is low in this area, and that there are no known viable deposits of copper.

Letter 3 - National Park Service

Response 3-1.

The Bureau planning process requires extensive analysis of impacts at the activity plan level. The impacts any action would have on any resource are scrutinized in detail at activity plan level, and when necessary, mitigation measures are incorporated in the plan. The Ten Year Timber Management Plan, The Timber Harvest Plan, The Wild and Scenic Rivers Act, and SYU 13 provide protection for affected resources. The one-half mile corridor is a guideline and, if necessary, can be expanded to assure the Wild and Scenic River is not adversely impacted.

Response 3-2.

See p. 1-6, Issues Considered But Dropped From Further Analysis, Item 1. There is little likelihood for surface disturbance that would significantly impact anadromous fisheries either within or outside the WSA.

Response 3-3.

See pp. 1-7 & 1-8, Issues Considered But Dropped From Further Analysis, Impacts on Cultural Resources. A field investigation by the Bureau and Sonoma State University, (p. 3-13, Cultural Resources) indicate a low level of cultural resources. Many of the sites along Elk Creek are on private property. The Programmatic Memorandum of Agreement (p. 4-13) between the California State Historic Preservation Office and the Advisory Council on Historic Preservation categorically excludes Section 106 consultation in WSAs. Livestock grazing is recognized as permissible in Wilderness Areas, so designation or nondesignation will have the same affect on cultural resources.

Letter 4 - Bureau of Reclamation

No response.

Letter 5 - Bureau of Land Management

Response 5-1.

See Response 18-5. From all available data, it is unlikely that mineral extraction will occur.

Response 5-2.

The EIS has been updated. As of August 27, 1986, there were no claims in either Eden Valley or Thatcher Ridge.

Response 5-3.

See pp. 3-10 and 3-18

Letter 6 - Mendocino County Department of Planning and Building Services

No response.

Letter 7 - Mendocino County Department of Public Works

Response 7-1.

The Bureau has no plans to provide additional public access to the area. With the current low level of use, and no projected significant increase in use, the proposed action will have no impact on local roads.

Letter 8 - Mendocino County Board of Supervisors

No response.

Letter 9 - Sierra Club

Response 9-1.

See p. 1-10, Alternatives Considered But Dropped From Further Analysis.

Response 9-2.

The public may gain access from the east via Forest Roads or by permission of surrounding landowners. Permission to use private lands is the prerogative of the landowners. While access is difficult and time consuming, it is available to the public.

Response 9-3.

The geographical area involved in timber sales is very limited, and little additional use is anticipated. While All Terrain Vehicles (ATV) sales are up, the area's remoteness would indicate that a large increase in the number of ORVs/ATVs is not to be expected. Since any use is restricted to designated roads, the impacts on raptors and riparian habitat will be minor.

Letter 10 - California Wilderness Coalition

Response 10-1.

See p. 1-10, Alternatives Considered But Dropped From Further Analysis.

Response 10-2.

Cost analyses are completed after a site has been added to the Ten-Year Harvest Plan. Since timber within WSAs is not placed in the plan, cost analyses will be completed only after release from WSA status. However, based on the data available, we believe these lands can be economically harvested.

Response 10-3.

The impacts of vehicles in the area under the No Wilderness/No Action Alternative are based on projections of existing trends and are provided to generically describe the impacts the presence of vehicles have on wilderness and other resources.

Response 10-4.

The two northern locations for timber harvesting are within the WSA. See Map 5.

Letter 11 - American Wilderness Alliance

Response 11-1.

See p. 1-8, Alternatives Considered But Dropped From Further Consideration. Lands under study for wilderness designation must be contiguous. The private lands between Eden Valley and Thatcher Ridge preclude the areas being studied as one unit. The northern portion of the Eden Valley WSA was dropped during the wilderness inventory, and an appeal to the IBLA was denied. In the 1984 California Wilderness Act, the Congress considered the suitability of U.S. Forest Service lands, and determined they were not suitable for inclusion in the National Wilderness Preservation System and directed the U.S. Forest Service to review the lands for suitability during the revision of the Forest Management Plan. This revision is expected to occur in the late 1990s.

Letter 12 - California Native Plant Society

Response 12-1.

The lack of present surface disturbing activities, and little likelihood of future development, would indicate little benefit from wilderness designation. In addition, the Wild and Scenic River Act and mitigation measures in SYU 13 provide substantial protection to the anadromous fisheries.

Response 12-2.

See Response 18-3.

Letter 13 - California Association of 4WD Clubs.

No response.

Letter 14 - Mendocino Public Lands Task Force.

Response 14-1.

The Federal Energy Regulatory Commission, in a telephone conversation, indicated there is no Commission No. 6565 on file. Either the application was rejected, withdrawn, or not completed. The Eel River is precluded from hydroelectric projects because of its Wild and Scenic River status. Proposals for hydro-electric projects are closely scrutinized by numerous local, state and federal agencies. Resource impacts, as well as mitigating measures, are carefully evaluated to determine the impacts on and the protection of natural resources.

Response 14-2.

The logging will have no effect on bald eagle roosting, as they roost near the water.

For fisheries and stream values see Response 13-2.

The presence of spotted owls has not been documented within the WSA. They have been found on adjacent forest lands.

Response 14-3.

See Response 18-5.

Response 14-4.

Grazing is allowed in both WSAs and established wilderness. If specific locations are supplied and unnecessary erosion can be traced to grazing operations, corrective measures will be taken.

See p. 4-6, Impact on Sensitive Plant Species Habitat.

See Response 11-1, and p. 1-8, Alternatives Considered But Dropped From Further Consideration, regarding the northern section of Eden Valley.

See p. 1-8, Issues Considered But Dropped From Further Analysis, Impact on Water Quality.

Response 14-5

Use and development projections are estimated on anticipated use in accordance with the area's remoteness, lack of public access, contacts and observations by BLM personnel while in the field, development trends, and the Bureau's best professional judgements.

Response 14-6.

Neither designation or nondesignation will have appreciable impacts. Logging is the only anticipated surface disturbing activity, and requirements of the Wild and Scenic Rivers Act and SYU 13 mitigation measures preclude significant resource damage.

Response 14-7.

The proposed action, No Wilderness/No Action, is consistent with planning documents of other agencies.

Letter 15 - Citizens Committee to Save Our Public Lands.

Response 15-1.

Old-growth timber is one of the categories of secondary criteria for establishing wilderness suitability. The Yolla Bolly-Middle Eel and Snow Mountain Wilderness areas have stands of old growth. There is no indication that the spotted owl is found in Thatcher Ridge WSA. In the Proposed Land and Resource Management Plan, the U.S. Forest Service is proposing Spotted Owl habitat in Management Areas 25, 23, 19, 18, 10, 9 and in Roadless Areas 05140 and 05141, all in the immediate vicinity of Thatcher Ridge. There is no evidence from available data there are any old growth dependent species within the timbered areas of Thatcher Ridge. In addition, old growth and old growth related species are secondary criteria to be considered when determining wilderness suitability. The WSA overall does not, in the Bureau's opinion, rate high enough to be included in the wilderness system.

Response 15-2.

From available data, there is no reason to believe that any logging or fuel wood will be cut within Eden Valley, nor is there any potential for the extraction or development of minerals, oil and gas or geothermal resources.

Letter 16 - The Planning and Conservation League

Response 16-1.

See Response 11-1.

Letter 17 - Earth First!

Response 17-1.

See Response 23-1.

Response 17-2.

See Response 11-1.

Letter 18 - Don Morris

Response 18-1.

The inventory identified those public lands that meet the criteria for further study as to their wilderness suitability. The quantification of the criteria was to be further studied and analyzed in the study phase. Only those areas with outstanding values will be recommended as suitable.

Response 18-2.

Use levels, because of the area's remoteness and lack of access, are difficult to obtain. Likewise, these two management restrictions would indicate public use level is low. Estimates of use are based on remoteness, lack of access, lack of evidence of use observed during patrols to the area, and the experience of professional staff in estimating use in this and similar circumstances.

Response 18-3.

There are no indications at this time that either mining activities or ORV use will appreciably increase in the future. The Bureau recognizes that wilderness values are present, but are not of the quality to sustain a suitable recommendation. If use does increase, then there could be some impacts on the values present.

Response 18-4.

Manageability is not discussed in the EIS, but in the Wilderness Study Report (WSR), prepared after the EIS is final. The WSR will address any anticipated circumstances that will either enhance or detract from managing the area as wilderness.

Response 18-5.

See Response 11-2 for projected ORV use. Minerals data were obtained from U.S.G.S. and Bureau of Mines reports on the surrounding area and from literature and journal research. There is no indication of present or future interest in mineral extraction.

There are no current studies to indicate wildlife populations specific to the area. The area is recognized as part of the general area's deer wintering range. Livestock grazing levels and impacts are based on the analysis in the Allotment Management Plan. Livestock grazing would be allowed to continue at the level when the area is established as wilderness. There are no projected livestock improvements that would impair wilderness resources. Range conditions are monitored to determine impact levels and remedial action taken when necessary.

Specific impacts caused by logging will be analyzed in the Timber Harvest Plan.

Response 18-6.

The 523.37 acres of commercial forest land (CFL) are identified in the Timber Production Capability Classification (TPCC) completed by the Bureau's forestry staff. While identified as CFL, it is not economically feasible to manage them for production. They are isolated, small parcels of mixed conifer (fir and cypress) of low quality and hardwoods.

Response 18-7.

The presence of ORVs is not used as a justification for the No Wilderness/No Action Alternative, but its presence is documented as are other uses or resources that occur in the WSA. Current and projected low levels of use and the absence of roads do not warrant additional public access for recreational purposes. The area has public access from the east.

Response 18-8.

Private property owners are not legally required to permit access across their properties in the absence of a right-of-way or easement.

Letter 19 - Jonothan M. Teague

Response 19-1.

See Response 11-1.

Letter 20 - Glen Holstein

Response 20-1.

Similar vegetation is found in Snow Mountain and the Yolla Bolly-Middle Eel Wilderness areas, and the Mendocino National Forest has set aside the Frentzel Creek Botanical Area, which protects a serpentine community. In addition, the Bureau's Northern California Chaparral RNA/ACEC protects some 11,000 acres of diverse coast range vegetation. Diversity is a secondary criteria for establishment of a wilderness, and is considered with all other resources in arriving at a suitability determination.

Letter 21 - William R. DeJage

Response 21-1.

See Response 14-1.

Response 21-2.

Fire management can be accomplished with a minimum of surface disturbance. No fuel breaks will be constructed. Prescribed burn areas are restricted to 15-20 acres to provide a mosaic pattern and reduce the likelihood of catastrophic fires. The helitorch will be used, and only ground crews with hand tools will be used to delineate fuel breaks.

Letter 22 - Cecelia Gregori

Response 22-1.

The only surface disturbing activity envisioned is the logging of the two parcels in Thatcher Ridge. The Wild and Scenic River requirements of nonimpairment will preclude any significant long-term adverse impacts. SYU 13 mitigation requirements provide additional protection.

Response 22-2.

See Response 1-2.

Response 22-3.

There are no anticipated surface disturbing development in the areas critical to sensitive plant species. Should activities such as prescribed burn arise, a site specific inventory will be completed and mitigation accomplished if necessary.

Response 22-4.

Under the East Mendocino Management Framework Plan and the draft Arcata Resource Management Plan, vehicle use in Eden Valley/Thatcher Ridge is limited to designated roads

Response 22-5.

See Response 20-1.

Letter 23 - Randolph J. Helms

Response 23-1.

The lack of resource conflicts is but one of many criteria evaluated to determine wilderness suitability. The mandatory wilderness criteria (i.e., size, roadless, unconfined recreation and solitude) as well as other supplemental resources are considered. In total, the Bureau feels that Eden Valley/Thatcher Ridge resources do not warrant a suitable wilderness recommendation.

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INDEX

INDEX

All Wilderness Alternative, Eden Valley WSA v, 1-9, 2-5, thru 2-10
All Wilderness Alternative, Thatcher Ridge WSA v, 1-10, 2-10, 2-11,
Cultural Resources 3-2, 3-3, 3-13, 3-14
East Mendocino MFP 1-9, 2-1
Federal Land Policy and Management Act, Section 603 1-1
Fire Management 2-1, 2-2, 2-5, 2-9
Interim Management Policy 1-3
Issues, Eden Valley WSA 1-6, 1-7
Issues, Thatcher Ridge WSA 1-7, 1-8
Land Tenure 2-2, 2-6, 2-10, 2-11, 3-2, 3-12
Livestock Grazing 2-2, 2-6, 2-9, 2-11, 3-10, 3-18
Mineral Development 2-2, 2-6, 2-10, 2-11. 3-9, 3-18
Proposed Action, Eden Valley WSA v, 1-9
Proposed Action, Thatcher Ridge WSA v, 1-9
Recreation 2-1, 2-5, 2-6, 2-10, 3-2, 3-3, 3-12, 3-14, 4-3, 4-6, 4-9, 4-13
Scoping Process 1-3
Sensitive Plant Species 2-12, 3-5, 4-3
Soils and Watershed 3-5, 3-17
Summary of Impacts, Eden Valley WSA 2-12
Summary of Impacts, Thatcher Ridge WSA 2-13
Timber Resources/Management 2-9, 2-11, 3-4, 3-14, 4-11, 4-15
Vegetation 2-1, 2-5, 2-9, 2-11, 3-4, 3-17
Visual Resources 3-3, 3-4, 3-14
Wild and Scenic River 1-8, 2-6, 3-13, 3-14, 4-7, 4-9
Wilderness Act of 1964 1-1
Wilderness Review Process 1-1
Wilderness Values 3-1, 3-2, 3-12, 3-13, 4-2, 4-3
Wildlife 2-2, 2-5, 2-9, 2-11, 3-6, 3-9, 3-18, 4-4, 4-7, 4-10, 4-14

Appendices

APPENDIX A
Sustained Yield Unit 13
Mitigation Measures

COMMENTS	MITIGATION
Soils/Watershed	Soils/Watershed
Studies have shown that ridge roads experience minor erosion, whereas roads on the upper one-third alope have seven times as much erosion and roada on the lower one-third slope have ten times as much erosion (Rice 1979b, Anderson no date). The worat location for increased sediment is along streams. Upgrading or improving streamside roads would cause even more of an increase in sedimentation.	Preferred road locations will be on ridgetopa and on the upper one-third of the slope.
The amount of erosion (mostly mass wasting) associated with roads increases with the slope of the terrain that the road traverses. Roads built on slopes over 60 percent experience up to 70 percent more erosion than those on flatter slopes (Rice 1979b and Dodge 1976).	Roads will not be built on slopes in excess of 60 percent.
It has been estimated that 50 to 95 percent of the soil eroded from a logged area is eroded within 2 years after completion of harvesting operations. Therefore, it is extremely important that erosion control facilities be maintained during this period (Dodge 1976).	Mainline roads will be maintained at least annually, and more often if warranted. Waterbars and drainage structures on spur roads will be maintained for two years after construction. Rolling grade dips will be constructed and maintained where necessary on mainline and spur roads.
Stabilization of the road surface and improved drainage reduces erosion from surface runoff. The steeper the grade, the more important rocking becomes.	Main haul roads will be rocked to a moderate depth if used year-round. Alternative: roads will be closed to all traffic, including BLM, during the rainy season.
Better design or modification of alignment can reduce mass wasting by 10 percent or more (Rice 1979b).	Geotechnical investigations will be conducted on proposed road locations far enough in advance of construction that major realignment can be surveyed and investigated.
Ripping of skid trails improves plant growth and reduces surface runoff. The need for ripping should be determined prior to treatment and not done as routine. Care should be exercised to prevent further compaction and root damage from the ripping treatment. Skid trails should be ripped during the season when the soils are the driest.	Skid trails will be ripped when needed to improve soil structure.
Less soil will be exposed to raindrop splash erosion and overland flow. Skid trails will not become drainageways into the stream channels.	No excavation will normally be permitted for skid trails.
High ground pressures of 20 to 28 psi exerted by rubber-tired skidders can cause long-term soil compaction problems. On the other hand, crawler tractors exert 6 to 13 psi and the FMC skidder about 5.5 psi, so compaction can be substantially reduced (Froehlich 1979).	Rubber-tired skidders will be prohibited except as swing machines on permanent mainline and spur roads.
Protection of active slides from tractor or road entry will reduce severity and speed of mass movement.	There will be a 100-foot buffer zone around active slides. Actual tractor or road entry will be prohibited within this zone. No logging will be done in the slide area and buffer zone, but downed trees can be salvaged by endlining from outside the buffer zone.
Road construction through areas of inactive slides could result in accelerated erosion and increased road maintenance.	Inactive slides will not be undercut by roads.
Where there is sufficient deflection, overhead cable yarding is less damaging then tractor skidding or high-lead ground yarding logs to landings. To get deflection, it could be necessary to cross a creek or canyon to obtain a tailhold on the opposite slope, or there could be logs on the opposite slope that must be removed. The tailhold must be made high enough that excessive soil disturbance does not occur within or directly above the creek buffer zone. This allows full suspension of logs crossing the buffer zone.	Cable yarding across streams will be permitted only if aufficient deflection is available on the yarding corridor to fully suspend logs. Sufficient deflection will be provided to prevent flown logs from hitting the edge of a bench or bluff directly above the creek bank.
Disturbance in the ephemeral channels and drainages is a major cause of erosion and sedimentation.	With the exception of road construction equipment, tractors and other machinery will not be permitted to operate within 30 feet of ephemeral channels and drainage areas. Merchantable trees may be harvested in this zone by directional falling techniques, but nonmerchantable vegetation will be left essentially intact. Hardwood control by hand and replanting may be done to maintain a productive timber site. When necessary, yarding across channels will be done only in dry weather and perpendicular to the channel.

COMMENTS	MITIGATION
Soils/Watershed (Continued)	Soils/Watershed (Continued)
Two major sources of stream sedimentation are washing of dust-coated roadside vegetation and washing and erosion of road surface material. Road oiling is a low cost control of this sediment washing. Successive re-application on continuous use roads will set up the surface material and reduce sediment for a longer period of time.	Road oiling using the proper formulation and successive reapplications will be done on continuous use roads.
Vegetation	Vegetation
BLM must supply its own seed to the nursery. Due to fires and past logging, good seed sources in some areas are difficult to locate and utilize. Numerous seed sources are needed to ensure genetic diversity and seeds best adapted to the site.	BLM will establish at least one seed production area for every seed zone and appropriate elevation zone.
Wildlife	Wildlife
Snags:	
After commitment of a forest tract to intensive timber management, the provisions of snags are one of the most important considerations for the retention of forest species. Recommendations are based on the needs of the most common and widespread primary cavity users observed in the SYU during 1978 field inventories. Various references were consulted (Bull 1978, Thomas 1979, USFS 1979b, and CDFG no date). The potential 6 snags per acre resulting from the six leave trees as explained in the managed old-growth alternative would eventually result in a high degree of retention of cavity users throughout the SYU. For this alternative to be of immediate benefit to wildlife, provisions should be made to provide these snags upon initiation of this management alternative. The reason so many snags are necessary is, for every snag suitable (various sizes and stages of deterioration) for cavity nesters, up to 15 may not be suitable (Bull 1978). However, most snags are used for perching and feeding by birds and will eventually be used as downed log habitat by a host of forest wildlife.	Where present, BLM will provide and maintain an average of 5-6 hard snags per acre (where feasible additional snags should be provided). - Approximately one-half of all snags retained should exceed 21" in diameter and preferably be over 45' in height. While large snags are preferred, advantage should be taken of any snags, particularly during initial harvest and early implementation of snag retention programs. - Snags can be left in small groups or singles to take advantage of existing snags. As snag management proceeds, it is desirable to distribute snags throughout the area. Overall, it is somewhat more desirable to leave proportionally more snags in the proximity of forest edges and streams. - Where choice is possible, ponderosa pine is a preferred species for snag retention. - All possible efforts will be made to meet snag requirements upon initial timber harvest entry. In some cases this may require leaving a safety zone (a radius of the length of the snag) around its base to protect workers. (See glossary for snag definition.)
Downed Logs and Debris:	
It is known that logs and forest debris provide habitat for a wide variety of wildlife and are important to the long term health of the forest environment (Franklin et al. 1979) At present there is no known scientific basis for predicting optimum amounts of logs and debris. It is known that a variety of logs in various stages of decay are desirable (Thomas 1979).	BLM will leave a minimum of 6 downed logs per acre (Thomas 1979). Additional logs are desirable. - When harvesting a stand, all presently occurring downed logs will be left in place. If an impassable jumble of logs is present, some can be scattered and, if necessary, removed. - Where the minimum number of logs does not occur, unmerchantable sections of cut cull trees will be left in place or brush piles can be substituted until downed logs can be recruited. - Uncharred logs are preferred since charring hardens the surface and slows decomposition, making them less valuable to wildlife. In this regard, broadcast burning of large acres of the forest floor will be discouraged. - It is desirable to maintain a variety of logs in various stages of decomposition, and orientation along contour lines is preferred (Thomas 1979). - The most desirable logs are at least 17" in diameter and 20' in length.

COMMENTS	MITIGATION
Wildlife (Continued)	Wildlife (Continued)
Hardwood (Broad-Leaved) Tree Retention:	
While it is implied that all broad-leaved trees and shrubs could not be removed during timber stand improvement a more conscious approach to size, number, and distribution should be required to provide plant species and canopy diversity.	BLM will retain and maintain a minimum of five mature broad-leaved trees per acre and the same number of younger replacement trees.
There are no known criteria for determining acceptable levels of broad-leaved tree retention at this time.	- Species retained will be representative of natural vegetation occurring on the site; however certain plants have greater value for wildlife than others. One such example is black oak (*Quercus kelloggii*). - Broad-leaved tree retention and recruitment recommendations will be made on a case-by-case basis by a wildlife biologist.
Protection of Seeps, Springs, Ponds, and Meadows:	
Seeps and springs are important to wildlife and should receive protection similar to streams.	Springs and seeps will be protected by 75' of undisturbed zones.
Meadows and forest edges contribute to overall forest habitat diversity and many species require these habitats in close proximity to one another. Naturally occurring wet meadows are especially important. The relatively small size of most timber stands makes the protection of meadows difficult.	Natural meadows will be protected by a minimum 75' buffer zone (measured horizontally). Final width recommendation will depend on density of the stand and other site specific criteria. A selective harvest may be permitted; however a minimum canopy cover of 50% will remain, and no more than half of the trees with dbh of 21" will be removed. All snags will be retained. The integrity of meadows will not be altered by timber harvest activities, including operation of machinery, falling, yarding, road construction, etc. If on a particular site it is believed that a 75' buffer zone would result in excessive damage from windthrow, the zone will be expanded or cutting will not occur.
Stand Management:	
Because of the overall small size of timber stands, it is difficult to manage for various stages of succession and thereby provide a continuum of all stages of succession in a local area. Legal difficulty and cost of access to Federal tracts compounds the problem. Consequently, timber harvest proposals are relatively large with frequent entry and would result in much of a timber stand area in one stage of succession.	A minimum of 20 acres of mature and/or old-growth forest will be retained in each harvest area. This is especially important where the harvest block is relatively small and contains all or most of the remaining mature timber in an area. Additional area may be required where sensitive species are involved. Attempts will be made to reduce the size of harvest area and stagger cutting cycles to provide a continuum of forest successional stages through long-term planning.
Steps should be taken to retain and/or provide mature and old-growth forest in all harvest areas. This would involve long term planning.	
An aspect of a multi-layered canopy should be retained. Maintaining scattered broad-leaved trees and superdominants would fulfill part of this requirement. A greater size and variety of conifers should also be considered.	
Sensitive Species:	
Spotted Owl If suitable old-growth reserves are not provided, spotted owl habitat can be preserved on a case-by-case basis. These areas would also provide habitat for a great variety of forest dependent species.	Approximately 300 acres, or where available more, will be provided for each pair of spotted owls. There have been 15 observations of this species as noted in Chapter 3 on public lands in SYU 13. If further inventory of these areas identifies them to be nesting sites, approximately 4,500 acres or 9.24 percent of the available productive forest land base would be deferred from forest management activities for an undeterminable period. Less area may be

COMMENTS	MITIGATION
Wildlife (Continued)	Wildlife (Continued)
Sensitive Species: (Continued)	provided where habitat use occurs in part on land in other ownership and can be preserved through cooperative effort (i.e., this would primarily involve the Nature Conservancy's North Coast Preserve and the U.S. Forest Service). Land classified as nonproductive forest can be incorporated if it provides suitable habitat. BLM will monitor known spotted owl areas every two years. Acres set aside for owls include the following: - the nest site or grove - the permanent water course closest to the nest area - where suitable, the hillside from drainage area to ridgetop. Mitigation recommendations for the SYU are adapted from Jackman and Scott 1975 and contain information from Nietro 1974 and Gould 1974. Much of the information is also contained in Zarn 1974.
Red-legged Frog Little suitable habitat anticipated on SYU land for this species.	If encountered, additional habitat protection may require the expansion of aquatic buffer zones to 200 feet and special precautions in logging the surrounding area (e.g., suspended cable yarding).
California Mountain King Snake Anticipated but not yet encountered on SYU lands.	Proposed buffer zones and downed log recommendations will provide a high degree of habitat protection for this species. No other mitigation proposed at this time.
Osprey No nesting sites known on SYU lands. Minor feeding use could occur on or adjacent to BLM timber stands.	If encountered on BLM land, nest sites will be protected by a no cut zone 600 feet in diameter (Jackman and Scott 1975). A one-half mile no disturbance zone will be imposed around the nest from February through August.
River Otter Permanent habitat expected to be very limited on SYU lands.	Where encountered, proposed buffer zone will be expanded to 200 feet and special logging methods imposed to reduce land disturbance.
Ringtail Because of habitat preference and proposed buffer zones, very little impact is anticipated.	No further mitigation proposed at this time.
Mountain Lion Due to large territory size and habitat preference, little impact is anticipated.	Any denning areas encountered will be protected from human disturbance by rerouting roads and other measures to reduce human disturbance. Bobcats will receive the same consideration as the mountain lion.
Other Species Requiring Spcecial Protection:	
Goshawk This species occurs in low densities with suitable habitat rapidly being lost. If encountered outside of a sizable reserve area, special habitat protection is necessary.	An undisturbed area of a minimum of 40 acres will be maintained around the nest site. Long term planning should provide for maintaining suitable nesting habitat in the area for the future. As much north facing slope should be included as possible (Jackman and Scott 1975). Ultimate size will depend on the amount of forest in the area. No timber harvest operations will occur within one-half mile of the nest site from March through August (USFS 1979b). There have been 3 observations of this species as noted in Chapter 3 on public lands in SYU 13. If further inventory results in identification of definite nest sites, approximately 120 acres or 0.2 percent of the available productive forest land base would be deferred from forest management activities for an undeterminable period.

COMMENTS	MITIGATION
Wildlife (Continued)	Wildlife (Continued)
Roads: Road crossings of streams should be discouraged. Often the major cause of stream degradation can be attributed to roads. Streamside zones are also extremely valuable to the widest variety of wildlife in an area (Bull 1978 and Thomas 1979).	Where stream crossings are absolutely necessary, the road will be constructed in such a manner so as to reduce the amount of streamside area involved to a minimum. This would involve an attempt to cross the stream and its buffer zone at a right angle. Roads and skid trails will not parallel buffer zones.
Timber Sale Inventory: Timber sale inventory by a qualified biologist is necessary if meaningful site-specific mitigation is to occur and for compliance with various laws and directives (e.g., Endangered Species Act 1973, amended 1978 and 1979).	Each proposed timber sale and road network will be inventoried by a wildlife biologist at an early stage of planning. Biologists from other agencies (e.g., CDFG, USFWS) will be asked to participate in sale area inspection and recommend mitigation. Special effort will be made to determine if suitable habitat is present for other low density species, including pine marten, fisher, red tree mouse and flamulated owl.
Cultural/Sociocultural	Cultural/Sociocultural
Avoidance is the preferred method for the protection of prehistoric and historic sites. Sites must be protected from vandalism and inadvertent destruction.	Mitigation will include: Signing- Under conditions of active or potential vandalism, cultural resources will be adequately signed, identifying the protection afforded by law. Care will be taken to ensure that signs are placed in a manner not to intrude upon the values of the site or to draw attention to the resource. Fencing/Gating - According to the control and preventive measures desired, fences, barriers, railings and gates can be used alone or in combination for restrictable access. In some cases it may be necessary to selectively exclude access to portions of the cultural resource. As with other on-site physical measures, care will be taken not to damage or intrude upon more values than are protected. There are different kinds of fences, barriers, railings and gates and different materials that can be used. The planned design and materials will avoid unwarranted intrusion on the site. In the design of barriers, maintenance requirements and safety will be considered. Patrolling/Surveillance - Patrols and inspections will be determined by the fragility of resource, degree of threat present, and the use and importance of the cultural resource. Where possible, fragile and accessible cultural resources will be visited and inspected frequently. The visit will result in a report documenting the status of the resource. The report will be evaluated by local, State and Federal agencies and other interested parties. Irregularly scheduled patrols are one of the best means of preventing pothunting, vandalism and other unauthorized use. Patrolling requires careful planning and timing to be effective.

COMMENTS	MITIGATION
Cultural/Sociocultural (Continued)	Cultural/Sociocultural (Continued)
	Erosion Control - Cultural resources are frequently threatened by various types of erosion. Patrols and inspection surveys will monitor erosion. Checks will be made at water levels, major runoff areas, and where other potential erosion problems exist. Adequate drainage will be provided to prevent damage to resources. Catch basins, diversion dams, and other protection measures can be constructed to reduce erosion and protect the cultural resource. Erosion control should always be performed off-site.
	Class III Inventory (Cultural resource sites): Four prehistoric sites are located on a tract of BLM land included in the 10-year plan. The Bureau will withdraw approximately 200 acres of the tract from the timber base to protect these sites.
	The remaining 7 sites will be protected by 200-foot buffer zones.
Good planning is necessary to inventory and protect sociocultural sites far in advance of proposed activities on public land.	The Bureau will design protective programs, complete compliance requirements, and implement preservation programs at least 1 year in advance of any timber sale or other timber management related activities. Each year the Bureau will complete cultural resource inventories for the tenth year timber sales.
	To determine the effectiveness of the proposed protection measures, the Bureau will develop and implement a monitoring program for each site recorded within the SYU 13 study area. A specific site map will be prepared and permanent photographic points will be established. If it is determined that sites are either directly or indirectly impacted by timber management activities or any other activities, i.e., recreation, the Bureau will reassess this protective program and will immediately initiate efforts to implement more effective measures.
Access to and road building on public land may encourage timber management activities or other site disturbances on adjacent private land.	If cultural resources are known to exist on private lands adjacent to BLM lands, the Bureau will encourage the private party to preserve and protect the prehistoric and/or historic sites.

DEPARTMENT OF THE INTERIOR

Office of the Secretary

National Park Service

DEPARTMENT OF AGRICULTURE

Office of the Secretary

Forest Service

National Wild and Scenic Rivers System; Final Revised Guidelines for Eligibility, Classification and Management of River Areas

AGENCY: National Park Service and Office of the Secretary, Interior; Forest Service and Office of the Secretary, USDA.

ACTION: Publication of final revised guidelines.

FOR FURTHER INFORMATION CONTACT:
Bob Brockwehl (NPS), 202/272-3566.
William R. Snyder (USFS), 202/382-8014.

SUPPLEMENTARY INFORMATION:
Guidelines for the study of potential national wild and scenic rivers and management of designated rivers were first issued jointly by the Department of Agriculture and the Department of the Interior in 1970. On January 28, 1981 draft revised guidelines were published in the **Federal Register** for public comment (Vol. 46, No. 18, pp. 9148–9158). The document which follows was prepared after consideration of 50 letters of comment received from other Federal agencies, State governments, private industry, citizens' groups and individuals. Major comments and responses are summarized below. Many of the comments received were not addressed because they related to aspects of the wild and scenic rivers program beyond the scope of these guidelines. (See Preface of the revised guidelines.)

Comments and Responses

Comment: The definition of the term outstandingly remarkable value is too vague and too liberal. Too many rivers will be eligible for designation, unreasonably constraining economic development of natural resources. *Response:* Balancing of the need for protection versus development of each river area will be considered by the Congress in deciding whether or not to designate the river area. A determination that a particular river is eligible for designation does not necessarily imply that designation is the best use of the river in terms of the national interest.

Comment: The guidelines give inadequate emphasis to public involvement in the study process. *Response:* Public involvement is sufficiently addressed in the context of environmental statements or assessments prepared in the study process.

Comment: The guidelines do not make sufficiently clear which of the management principles apply to private lands. *Response:* The guidelines may be unclear to the general reader in this respect. The managment principles are to be implemented throughout each river area to the fullest extent possible under the managing agency's general statutory authorities and other existing Federal, State and local laws, including zoning ordinances where available. Some management principles obviously apply only to Federal lands within the river area. For instance, the Wild and Scenic Rivers Act does not open private lands to public recreation. Management principles may apply to private lands only to the extent required by other laws such as local zoning and air and water pollution regulations.

Comment: Restriction of timber harvest to selective harvest techniques is unnecessarily limiting from both the timber production and the natural resource preservation standpoints. *Response:* The guidelines have been amended in accordance with this comment.

Comment: Specific guidance contained in the 1970 guideline with respect to the granting of rights-of-way for transmission lines is omitted from the revised draft guidelines. *Response:* The subsection on rights-of-way has been amended in accordance with this comment.

Comment: A protected study area extending one half mile from each bank of the river is excessive when the final boundaries of a river area must average no more than one quarter mile from each bank (320 acres per mile). *Response:* The half-mile figure was intended to ensure that all areas likely to be included within the boundaries of a designated river area would be considered in the study process. Setting a study boundary based on the "visual corridor" concept was considered but rejected. The one-quarter-mile figure was finally selected to avoid unnecessary limitations on resource developments. Some developments which may be initiated beyond the one-quarter-mile boundary during the study period might be affected in the future if the area under development is included in the boundaries of the river area designated by Congress.

Comment: Evaluation of the study area in its existing condition for classification purposes does not allow for the fact that a forest area growing in relatively natural condition at the time of the study may be scheduled for clearcutting at some future date. The classification process should allow for authorized and scheduled future uses which could change the condition and, thus, the classification of the river area. *Response:* The guidelines have been amended to permit consideration of alternative classifications for the river area where authorized future uses could alter classification.

The following additional changes were made in response to suggestions from the reviewing public or from reviewers within the responsible agencies.

- Unnecessary definitions were deleted.
- Quotations and paraphrases of the Wild and Scenic River Act (including the whole of Section II—Policy) were eliminated as much as possible. Instead, the guidelines will reference the appropriate sections of the Act where necessary.
- The entire subsection titled "Findings and Recommendations" and portions of the subsection titled "General Management Principles" were deleted and their content was placed in other appropriate sections.

Additional copies of the guidelines, the Wild and Scenic Rivers Act, as amended, and further information on the National Wild and Scenic Rivers System may be obtained from: National Park Service, Rivers and Trails Division (780), 440 G Street, N.W., Washington, D.C. 20243.

Dated: July 12, 1982.

G. Ray Arnett,
Assistant Secretary for Fish and Wildlife and Parks (Interior).

Dated: August 26, 1982.

Douglas W. MacCleery,
Deputy Assistant Secretary for Natural Resources and Environment (Agriculture).

Department of Agriculture

Department of the Interior

National Wild and Scenic Rivers System

Guidelines for Eligibility, Classification and Management of River Areas.

Contents

Preface

The National Wild and Scenic Rivers System
Addition of Rivers to the System
The Guidelines
Revision of the Guidelines

Section I

Definitions

Section II

The River Study

The Study Process
The Study Report
Description of the Study Area
Determination of Eligibility
Classification
Analysis of Alternatives

Section III

Management
General Management Principles

Tables

Table 1

Accelerated Study Schedule

Table 2

Classification Criteria for Wild, Scenic and Recreational River Areas

Appendix

The Wild and Scenic Rivers Act (Pub. L. 90–542 as amended through Pub. L. 96–487)

Preface

The National Wild and Scenic Rivers System

The Wild and Scenic Rivers Act, (Pub. L. 90–542 as amended; 16 U.S.C. 1271–1287) established a method for providing Federal protection for certain of our country's remaining free-flowing rivers, preserving them and their immediate environments for the use and enjoyment of present and future generations. Rivers are included in the system so that they may benefit from the protective management and control of development for which the Act provides.

The preamble of the Act states:

> It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations. The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes.

Addition of Rivers to the System

The Wild and Scenic Rivers Act provides two methods for adding a river to the National Wild and Scenic Rivers System. The first method is by an act of Congress. Congress can designate a river directly or it can authorize a river for study as a potential wild, scenic or recreational river. Upon completion of a study conducted by the Department of the Interior or the Department of Agriculture, a study report is prepared and transmitted to the President who, in turn, forwards it with his recommendations to Congress for action.

The second method for inclusion of a river in the national system is through the authority granted to the Secretary of the Interior in section 2(a)(ii) of the Act. Upon application by the Governor or Governors of the State or States involved, the Secretary can designate a river as a component of the national system provided that the river has been designated as a wild, scenic or recreational river by or pursuant to an act of the legislature of the State or States through which if flows to be permanently administered as a wild, scenic, or recreational river by an agency or political subdivision of the State or States concerned.

To be eligible for inclusion in the system through either method, rivers must meet certain criteria set forth in section 2(b) of the Act. Procedures for proposing State-administered rivers for designation have been issued by the Department of the Interior.

The Guidelines

Subsequent to enactment of the Wild and Scenic Rivers Act in October 1968, the Departments of Agriculture and the Interior initiated studies of twenty-seven rivers which the Act authorized for study as potential additions to the National Wild and Scenic Rivers System. As these studies progressed, it became evident that specific requirements of the Act concerning the evaluation, classification and management of these rivers were subject to differing interpretations within and between the two departments.

It was therefore agreed that a uniform evaluation and management approach should be formulated for use by the two departments, and through a cooperative effort, *Guidelines for Evaluating Wild, Scenic and Recreational River Areas Proposed for Inclusion in the National Wild and Scenic Rivers System Under Section 2, Public Law 90–542* was prepared and promulgated in February 1970.

The guidelines not only provide guidance for the congressionally mandated studies under section 5(a) of the Act, but are also useful for evaluations conducted by water resource development agencies under section 5(d) and for States applying for inclusion of State-designated rivers in the national system.

Revision of the Guidelines

While these guidelines were effective throughout a decade, it became clear that revision was necessary to incorporate changes identified through use and to reflect requirements of new laws and regulations. Therefore, on August 2, 1979, the President directed in his Environmental Message that "the Secretary of Agriculture and the Secretary of the Interior shall jointly revise their guidelines for evaluating wild, scenic and recreational rivers to ensure consideration of river ecosystems and to shorten the time currently used to study rivers for designation."

This revision of the guidelines has been prepared in response to the President's 1979 directive and includes:

- Clarification of the fact that free-flowing rivers which contain outstandingly remarkable ecological values are eligible for addition to the national system.
- Clarification of the fact that free-flowing river segments in or near urban areas that possess outstandingly remarkable values are eligible for addition to the national system.
- Elimination of the 25-mile minimum length guideline.
- Revision of the definition of sufficient river flow or volume of water in the river. Sufficient flow was not defined in the Act and the definition in the existing guidelines was unnecessarily limiting.
- Revised water quality guidelines to allow inclusion in the system of rivers where restoration to high water quality is planned.
- A revised section on management of designated river areas.
- A study schedule to accelerate completion of the river studies authorized by Congress.

Section I—Definitions

The following definitions are provided for the purpose of these guidelines only.

Act: The Wild and Scenic Rivers Act.

Carrying capacity: The quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free-flowing character of the river area, the quality of recreation experience, and public health and safety.

Classification criteria: Criteria specified in Section 2(b) of the Act for determining the classification (wild, scenic or recreational) of eligible river segments.

Classification: The process of determining which of the classes outlined in section 2(b) of the Act (wild, scenic, or recreational) best fit the river or its various segments.

Component: A river area designated as a unit of the National Wild and Scenic Rivers System.

Designation: Inclusion of a river area in the national system either by act of Congress or by authority of the Secretary of the Interior.

Development: Any manmade structure or modification of the natural or existing river environment.

Eligibility: Qualification of a river for inclusion in the national system through determination that it is free-flowing and with its adjacent land area possesses at least one outstandingly remarkable value.

Flow: The volume of water in a river passing a given point in a given period of time, usually expressed in terms of cubic feet per second or cubic meters per second.

Impoundment: A body of water formed by any manmade structure.

Management plan: The detailed development plan required under section 3(b) of the Act which states the boundaries and classification of the river area and presents a plan for its public use, development and administration.

Primary contact recreation: Activities in which there is prolonged and intimate contact with the water, (e.g., swimming, water skiing, surfing, kayaking, "tubing," and wading or dabbling by children.

River area: For a river study, that portion of a river authorized by Congress for study and its immediate environment comprising an area extending at least one-quarter mile from each bank. For designated rivers, the river and adjacent land within the authorized boundaries.

Secondary contact recreation: Activities in which contact with the water is either incidental or accidental, e.g., boating, fishing and limiting contact with water incident to shoreline activities.

Study agency: The agency within the Department of Agriculture or the Department of the Interior delegated the responsibility for a wild and scenic river study.

Study report: The report on the suitability or nonsuitability of a study river for inclusion in the national system, which section 4(a) requires the Secretary of Agriculture, or the Secretary of the Interior, or both jointly to prepare and submit to the President. The President transmits the report with his recommendation to the Congress.

Study team: A team of professionals from interested local, State and Federal agencies invited by the study agency and participating in the study.

Section II—The River Study

The Study Process

Section 4(a) mandates that all rivers designated as potential additions to the system in section 5(a) be studied as to their suitability for inclusion in the system:

> The Secretary of the Interior or, where national forest lands are involved, the Secretary of Agriculture or, in appropriate cases, the two Secretaries jointly shall study and submit to the President reports on the suitability or nonsuitability for addition to the national wild and scenic rivers system of rivers which are designated herein or hereafter by the Congress as potential additions to such system. The President shall report to the Congress his recommendations and proposals with respect to the designation of each such river or section thereof under this Act.

The purpose of a wild and scenic river study is to provide information upon which the President can base his recommendation and Congress can make a decision. Procedures for developing the necessary information and preparing the study report may vary depending on the agency which conducts the study, but generally will include the steps shown on Table 1, Accelerated Study Schedule.

Wild and scenic river studies will comply with all applicable statutes and executive orders, which may include the following: the National Environmental Policy Act (Pub. L. 91–190), the National Historic Preservation Act (Pub. L. 89–665), the Endangered Species Act (Pub. L. 93–205), the Fish and Wildlife Coordination Act (Pub. L. 85–264), the Water Resources Planning Act (Pub. L. 89–80), the Floodplain and Wetlands Executive Orders (E.O. 11988 and E.O. 11990), the National Forest Management Act of 1976 (Pub. L. 94–588), the Federal Land Policy and Management Act of 1976 (Pub. L. 94–579), the Wild and Scenic Rivers Act, (Pub. L. 90–542, as amended), and any rules and regulations issued pursuant thereto.

The Study Report

Each river study report will be a concise presentation of the information required in sections 4(a) and 5(c) of the Act as augmented by the Council on Environmental Quality regulations implementing the procedural provisions of the National Environmental Policy Act (40 CFR Parts 1500–1508).

Section 4(a):

> Each report, including maps and illustrations, shall show among other things the area included within the report; the characteristics which do or do not make the area a worthy addition to the system; the current status of land ownership and use in the area; the reasonably foreseeable potential uses of the land an water which woud be enhanced, foreclosed or curtailed if the area were included in the national wild and scenic rivers system; the Federal agency (which in the case of a river which is wholly or substantially within a national forest, shall be the Department of Agriculture) by which it is proposed the area, should it be added to the system, be administered; the extent to which it is proposed that such administration, including the costs thereof, be shared by State and local agencies; and the estimated cost to the United States of acquiring necessary lands and interests in land and of administering the area, should it be added to the system.

In addition, section 5(c) requires that

> The study of any of said rivers * * * shall include a determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the national wild and scenic rivers system.

Study reports may be combined with draft and final environmental impact statements (EIS) as permitted by § 1506.4 of the Council on Environmental Quality regulations. Study reports will be reviewed by other Federal agencies, states and the public as requried by section 4(b) of the Wild and Scenic Rivers Act. Each of the following subsections describes the way in which the information is generated, analyzed and presented in the report.

Description of the River Area

Each report will contain a description of the area included in the study. The study area will cover, as a minimum, an area extending the length of the river segment authorized for study and extending in width one-quarter mile from each bank of the river.

Adjacent river areas beyond one quarter mile form each river bank may be studied if their inclusion could facilitate management of the resources of the river area. For example, there may be important historic, archeological or ecological resource areas which may extend beyond the boundaries of the mandated study area, but could be better managed by inclusion in the river area. Also, management of the river area may be facilitated by extension to include established or available access points not included in the study.

For the purposes of study and determining eligibility and classification, the river area may be divided into segments.

The description of the river area will identify the outstandingly remarkable values and the extent of man's activity in the river environment to provide a clear basis for findings of eligibility and classification. While only one outstandingly remarkable value is necessary for eligibility, the study report should carefully document all values of the river area.

In addition to the information required by Sections 4(a) and 5(c) of the Act, this section of the report will describe any existing zoning ordinances or other provisions of law governing land use in the study area.

If the study report and the environmental impact statement are combined, the same chapter may describe both the river area and the affected environment. For EIS purposes and for general information, a brief description of the regional setting will also be included.

Determination of Eligibility

Each report will contain a determination as to the eligibility of all portions of the authorized study area.

Section 2(b) of the Act states that "a * * * river area eligible to be included in the system is a free-flowing stream and the related adjacent land area that possesses one or more of the values referred to in section 1, subsection (b) of this Act." The terms "river" and "free-flowing" are defined in section 16 of the act.

In reading and applying the criteria for eligibility, the following points are relevant:

- The fact that a river segment may flow between large impoundments will not necessarily preclude its designation. Such segments may qualify if conditions within the segment meet the criteria.
- Rivers or river segments in or near urban areas that possess outstandingly remarkable values may qualify. Only one outstandingly remarkable value is needed for eligibility.
- In addition to the specific values listed in Section 1(b) of the Act, other similar values, such as ecological, if outstandingly remarkable, can justify inclusion of a river in the national system.
- The determination of whether a river ara contains "outstandingly remarkable" values is a professional judgment on the part of the study team. The basis for the judgment will be documented in the study report.
- There are no specific requirements concerning the length or the flow of an eligible river segment. A river segment is of sufficient length if, when managed as a wild, scenic or recreational river area, the outstandingly remarkable values are protected. Flows are sufficient if they sustain or complement the outstandingly remarkable values for which the river would be designated.

Classification

Study reports will indicate the potential classification which best fits each eligible river segment as viewed in its existing condition. Section 2(b) of the Act states that rivers which are found eligible and included in the National ~~Wild and Scenic Rivers Systems shall~~ be classified as one of the following:

(1) Wild river areas—Those rivers or sections of rivers that are free of impoundments and generally inaccesible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.

These criteria are interpreted as follows:

a. "Free of impoundments." Wild river areas shall be free of impoundments.

b. "Generally inaccessible except by trail." Wild river areas will not contain roads, railroads, or other provisions for vehicular travel within the river area. The existence of a few inconspicuous roads leading to the boundary of the river area at the time of study will not necessarily bar wild river classification.

c. "Watersheds or shorelines essentially primitive." Wild river areas will show little or no evidence of human activity. Shorelines and watersheds within the river area should be essentially free of structures including such things as buildings, pipelines, powerlines, dams, pumps, generators, diversion works, rip-rap and other modifications of the waterway or adjacent land within the river corridor. The existence of a few inconspicuous structures, particularly those of historic or cultural value, at the time of study need not bar wild classification.

A limited amount of domestic livestock grazing or hay production may be considered "essentially primitive." There should be no row crops or ongoing timber harvest and the river area should show little or no evidence of past logging activities.

d. "Waters unpolluted." The water quality of a wild river will meet or exceed Federal criteria or federally approved State standards for aesthetics, for propagation of fish and wildlife normally adapted to the habitat of the stream, and for primary contact recreation except where exceeded by natural conditions.

(2) Scenic river areas—Those rivers or sections or rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

These criteria are interpreted as follows:

a. "Free of impoundments." Scenic river areas will be free of impoundments.

b. "Shorelines or watersheds still largely primitive." To qualify for scenic classification, the rivers segment's shorelines and immediate environment should not show substantial evidence of human activity. The portion of the watershed within the boundary of the scenic river may have some discernible existing development. "Largely primitive" means that the shorelines and the immediate river environment still present an overall natural character, but that in places land may be developed for agricultural purposes. Row crops would be considered as meeting the test of "largely primitive," as would timber harvest and other resource use, providing such activity is accomplished without a substantial adverse effect on the natural appearance of the river or its immediate environment.

c. "Shorelines largely undeveloped" means that any structures or concentration of structures must be limited to relatively short reaches of the total area under consideration for designation as a scenic river area.

d. "Accessible in places by road" means that roads may reach the river area and occasionally bridge the river. The presence of short stretches of conspicuous or longer stretches of inconspicuous and well-screened roads or railroads will not necessarily preclude scenic river designation. In addition to the physical and scenic relationship of the free-flowing river area to roads or railroads, consideration should be given to the type of use for which such roads or railroads were constructed and the type of use which would occur within the proposed scenic river area.

(3) Recreational river areas—Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

These criteria are interpreted as follows:

a. "Readily accessible by road or railroad." River areas classified as recreational may contain existing parallel roads or railroads in close proximity to one or both banks of the river as well as bridge crossings and roads fording or ending at the river.

b. "Some development along their shorelines." Lands may have been developed for the full range of agricultural and forestry uses, may show evidence of past and ongoing timber harvest, and may include some residential, commercial or similar development.

c. "Some impoundment or diversion in the past." There may be some existing impoundments, diversions and other modifications of the waterway having an impact on the river area. Existing low dams, diversion works, rip-rap and other minor structures will not bar recreational classification, provided the waterway remains generally natural and riverine in appearance.

The classification criteria are summarized in Table 2, appended to these guidelines.

There are several points which all participants and observers of the study process should bear in mind when reading and applying the classification criteria:

- It is important to understand each criterion, but it is more important to understand their collective intent. Each river segment and its immediate environment should be considered as a unit. The basis for classification is the degree of naturalness, or stated negatively, the degree of evidence of man's activity in the river area. The most natural rivers will be classified wild; those somewhat less natural, scenic, and those least natural, recreational.

  Generally, only conditions within the river area determine classification; however, occasionally conditions outside the river area, such as developments which could impact air and water quality, noise levels or scenic views within the river area, may influence classification.

  For the purpose of classification, a river area may be divided into segments. Each segment, considered as a whole, will conform to one of the classifications. In segmenting the river the study team should take into account the management strategies necessary to administer the entire river area and should avoid excessive segmentation.

  The Wild and Scenic Rivers Act provides no specific guidance on water quality for scenic and recreational rivers. However, the Clean Water Act has made it a national goal that all waters of the United States be made fishable and swimmable, and provides the legal means for upgrading water quality in any river which would otherwise be suitable for inclusion in the system. Therefore, rivers will not necessarily be excluded from the system because of poor water quality at the time study, provided a water quality improvement plan exists or is being developed in compliance with applicable State and Federal laws.
- Although each classification permits certain existing development, the criteria do not imply that additional inconsistent development is permitted in the future.
- The classification criteria provide uniform guidance for professional judgment, but they are not absolutes. It is not possible to formulate criteria so as to mechanically or automatically classify river areas. Therefore, there may occasionally be exceptions to some of the criteria. For example, if the study team finds that strict application of the statutory classification criteria would not provide the most appropriate classification for a specific river segment, the study report may recommend for congressional consideration an exception to the classification criteria.

Analysis of the Alternatives

To provide for decisionmaking and to satisfy the requirements of the National Environmental Policy Act, study reports will include an analysis of alternatives. The study team will develop an array of alternative plans encompassing all reasonable proposals for use of the river area including uses which may be incompatible with designation of the river area as a component of the national system. Where appropriate, alternative plans for the river area may be based on, but not limited to:

- Alternative managing agencies for the river area;
- Alternative protective measures other than national designation;
- Alternative uses of the area incompatible with designation as a component of the national system; and
- Alternative classifications for the river area. Occasionally there may be authorized but not yet constructed projects, which if constructed would alter the classification of the river area. In such cases, alternatives may be presented to permit consideration of the river area as it would be classified both with and without the authorized project. Authorized projects may include approved land management plans prepared by a Federal land management agency under its statutory authorities.

The study report will present at least one alternative plan calling for national designation through either Congressional or Secretarial designation of all eligible segments of the congressionally authorized study area.

If the study team finds a segment ineligible for designation as a component of the National Wild and Scenic Rivers System, but still worthy of protection, alternatives for State, local or private preservation may be presented, as well as protection under other Federal programs.

If areas adjacent to the study area have been studied and found eligible, the report may present alternatives which incorporate ~~such areas into the~~ river area proposed for designation. Such expansion of the original study area either in length or in width may be desirable to preserve and facilitate management of river ecosystems, historic or archeological areas or other special areas.

Section III—Management

Wild and scenic rivers shall be managed with plans prepared in accordance with the requirements of the Act, other applicable laws, and the following general management principles. Management plans will state: General principles for any land acquisition which may be necessary; the kinds and amounts of public use which the river area can sustain without impact to the values for which it was designated; and specific management measures which will be used to implement the management objectives for each of the various river segments and protect esthetic, scenic, historic, archeologic and scientific features.

If the classification or classifications determined in the management plan differ from those stated in the study report, the management plan will describe the changes in the existing condition of the river area or other considerations which required the change in classification.

General Management Principles

Section 10(a) states,

> Each component of the national wild and scenic rivers system shall be administered in such a manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its esthetic, scenic, historic, archeologic, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development on the special attributes of the area.

This section is interpreted as stating a nondegradation and enhancement policy for all designated river areas, regardless of classification. Each component will be managed to protect and enhance the values for which the river was designated, while providing for public recreation and resource uses which do not adversely impact or degrade those values. Specific management strategies will vary according to classification but will always be designed to protect and enhance the values of the river area. Land uses and developments on private lands within the river area which were in existence when the river was designated may be permitted to continue. New land uses must be evaluated for their compatibility with the purposes of the Act.

The management principles which follow stem from section 10(a). Managing agencies will implement these principles to the fullest extent possible under their general statutory authorities and existing Federal, State and local laws. Because of these limitations, however, implementation of the principles may differ among and within components of the system depending on whether the land areas involved are federally, State, locally or privately owned.

Carrying Capacity. Studies will be made during preparation of the management plan and periodically thereafter to determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area. Management of the river area can then be planned accordingly.

Public Use and Access. Public use will be regulated and distributed where necessary to protect and enhance (by allowing natural recovery where resources have been damaged) the resource values of the river area. Public use may be controlled by limiting access to the river, by issuing permits, or by other means available to the managing agency through its general statutory authorities.

Basic Facilities. The managing agency may provide basic facilities to absorb user impacts on the resource. Wild river areas will contain only the basic minimum facilities in keeping with the "essentially primitive" nature of the area. If facilities such as toilets and refuse containers are necessary, they will generally be located at access points or at a sufficient distance from the river bank to minimize their intrusive impact. In scenic and recreational river areas, simple comfort and convenience facilities such as toilets, shelters, fireplaces, picnic tables and refuse containers are appropriate. These, when placed within the river area, will be judiciously located to protect the values of popular areas from the impacts of public use.

Major Facilities. Major public use facilities such as developed campgrounds, major visitor centers and administrative headquarters will, where feasible, be located outside the river area. If such facilities are necessary to provide for public use and/or to protect the river resource, and location outside the river area is infeasible, such facilities may be located within the river area provided they do not have an adverse effect on the values for which the river area was designated.

Motorized Travel. Motorized travel on land or water is generally permitted in wild, scenic and recreational river areas, but will be restricted or prohibited where necessary to protect the values for which the river area was designated.

Agricultural and Forestry Practices. Agricultural and forestry practices should be similar in nature and intensity to those present in the area at the time of designation. Generally, uses more intensive than grazing and hay production are incompatible with wild river classification. Rowcrop production and timber harvest may be practice in recreational and scenic river areas. Recreational river areas may contain an even larger range of agricultural and forestry uses. Timber harvest in any river area will be conducted so as to avoid adverse impacts on the river area values.

Other Resource Management Practices. Resource management practices will be limited to those which are necessary for protection, conservation, rehabilitation or enhancement of the river area resources. Such features as trail bridges, fences, water bars and drainage ditches, flow measurement devices and other minor structures or management practices are permitted when compatible with the classification of the river area and provided that the area remains natural in appearance and the practices or structures harmonize with the surrounding environment.

Water Quality. Consistent with the Clean Water Act, water quality in wild, scenic and recreational river areas will be maintained or, where necessary, improved to levels which meet Federal criteria or federally approved State standards for aesthetics and fish and wildlife propagation. River managers will work with local authorities to abate activities within the river area which are degrading or would degrade existing water quality.

Additional management principles stem from other sections of the Act as follows:

Land Acquisition: Section 6
Water Resource Development: Section 7
Mining: Section 9
Management of Adjacent Federal Lands: Section 12(a)
Hunting and Fishing: Section 13(a)
Water Rights: Section 13(b)–(f)
Rights-of-Way: Section 13(g)

The following policies are consistent with and supplement the management principles stated in the Act:

Land Use Controls. Existing patterns of land use and ownership should be maintained, provided they remain consistent with the purposes of the Act. Where land use controls are necessary to protect river area values, the managing agency will utilize a full range of land-use control measures including zoning, easements and fee acquisition.

Rights-of-Way. In the absence of reasonable alternative routes, new public utility rights-of-way on Federal lands affecting a Wild and Scenic River area or study area will be permitted. Where new rights-of-way are unavoidable, locations and construction techniques will be selected to minimize adverse effects on scenic, recreational, fish and wildlife and other values of the river area.

Other legislation applicable to the various managing agencies may also apply to wild and scenic river areas. Where conflicts exist between the provisions of the Wild and Scenic Rivers Act and other acts applicable to lands within the system, the more restrictive provisions providing for protection of the river values shall apply.

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TABLE 1.

ACCELERATED STUDY SCHEDULE

MONTHS

River Study Tasks	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
1. Organize study team Prepare study plan Public information meetings Scope critical issues	▨																													
2. Resource Inventories (a) Study Bndry. Locations (b) River eligibility and classification avalu. (c) Literature search (d) Other agency contacts (e) Resource maps		▨	▨	▨	▨	▨																								
3. Develop alternative (a) Prepare alternatives display (b) Public meetings on findings and alternat. (c) Analyze Public Input (d) Evaluate alternatives							▨	▨	▨	▨																				
4. Complete Preliminay Report/ DEIS							▨	▨	▨	▨																				
5. Review of Draft (a) Internal Review (b) Revise preliminary as needed (c) Prepare camera ready copy (d) Print Draft Report/EIS (e) Distribute for 90-day review (a) Public meetings or formal hearings during review											▨	▨	▨	▨	▨	▨	▨													
6. Analyze Review Input Revise draft as needed. Internal Review																		▨	▨	▨										
7. Print Final Report																					▨	▨	▨	▨						
8. Secretary's decision and transmittal of report w/ recommendations to OMB																					▨	▨	▨	▨						
9. Executive review and transmittal to the Congress																														

This schedule does not take into account the possibility of delays due to Congressional concern, interagency or intradepartmental concerns or other possible outside influences that cannot be planned for.

TABLE 2.

CLASSIFICATION CRITERIA FOR WILD, SCENIC AND RECREATIONAL RIVER AREAS *

ATTRIBUTE	WILD	SCENIC	RECREATIONAL
Water Resources Development	Free of impoundment.	Free of impoundment.	Some existing impoundment or diversion. The existence of low dams, diversions or other modifications of the waterway is acceptable, provided the waterway remains generally natural and riverine in appearance.
Shoreline Development	Essentially primitive. Little or no evidence of human activity. The presence of a few inconspicuous structures, particularly those of historic or cultural value, is acceptable. A limited amount of domestic livestock grazing or hay production is acceptable. Little or no evidence of past timber harvest. No ongoing timber harvest.	Largely primitive and undeveloped. No substantial evidence of human activity. The presence of small communities or dispersed dwellings or farm structures is acceptable. The presence of grazing, hay production or row crops is acceptable. Evidence of past or ongoing timber harvest is acceptable, provided the forest appears natural from the riverbank.	Some development. Substantial evidence of human activity. The presence of extensive residential development and a few commercial structures is acceptable. Lands may have been developed for the full range of agricultural and forestry uses. May show evidence of past and ongoing timber harvest.
Accessibility	Generally inaccessible except by trail. No roads, railroads or other provision for vehicular travel within the river area. A few existing roads leading to the boundary of the river area is acceptable.	Accessible in places by road. Roads may occasionally reach or bridge the river. The existence of short stretches of conspicuous or longer stretches of inconspicuous roads or railroads is acceptable.	Readily accessible by road or railroad. The existence of parallel roads or railroads on one or both banks as well as bridge crossings and other river access points is acceptable.
Water Quality	Meets or exceeds Federal criteria or federally approved State standards for aesthetics, for propagation of fish and wildlife normally adapted to the habitat of the river, and for primary contact recreation (swimming) except where exceeded by natural conditions.	No criteria prescribed by the Wild and Scenic Rivers Act. The Federal Water Pollution Control Act Amendments of 1972 have made it a national goal that all waters of the United States be made fishable and swimmable. Therefore, rivers will not be precluded from scenic or recreational classification because of poor water quality at the time of their study, provided a water quality improvement plan exists or is being developed in compliance with applicable Federal and State laws.	

* Table to be used only in conjunction with text.

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